# VPDES PERMIT PROGRAM FACT SHEET

FILE NO: 0043

This document gives pertinent information concerning the VPDES Permit listed below. This permit is being processed as a **MINOR, INDUSTRIAL** permit.

1. **PERMIT NO.:** VA0087599 **EXPIRATION DATE:** 11/30/2008

2. **FACILITY NAME / MAILING ADDRESS**

Associated Naval Architects, Inc.
3400 Shipwright Street
Portsmouth, VA 23703

**FACILITY LOCATION ADDRESS** (IF DIFFERENT)

SAME

**CONTACT AT FACILITY:**
**NAME:** Mr. Bill Espich
**TITLE:** Vice President, Operations
**PHONE:** (757) 484-5320

**CONTACT AT LOCATION ADDRESS**

SAME

3. **OWNER CONTACT:** (TO RECEIVE PERMIT)
**NAME:** Mr. M. V. Craft
**TITLE:** President
**COMPANY NAME:** SAME
**ADDRESS:** SAME
**PHONE:** (757) 484-5320

**CONSULTANT CONTACT:**
**NAME:** Ms. Marina Phillips, Counsel
**FIRM NAME:** Kaufman & Canoles
**ADDRESS:** P.O. Box 3037
Norfolk, VA 23514
**PHONE:** (757) 624-3279

4. **PERMIT DRAFTED BY:** DEQ, Water Permits, Tidewater Regional Office

Permit Writer(s): C. Thomas Date(s): June - September, 2008; 11/09 cwt 12/09 cwt
Reviewed By: M. Sauer Date(s): 9/4/08

5. **PERMIT ACTION:**

( ) Issuance **(X) Reissuance** ( ) Revoke & Reissue ( ) Owner Modification
( ) Board Modification ( ) Change of Ownership/Name [Effective Date: N/A ]

6. **SUMMARY OF SPECIFIC ATTACHMENTS LABELED AS:**

| | | |
|---|---|---|
| Attachment | 1 | Site Inspection Report/Memorandum |
| Attachment | 2 | Discharge Location/Topographic Map |
| Attachment | 3 | Schematic/Plans & Specs/Site Map/Water Balance |
| Attachment | 4 | TABLE I - Discharge/Outfall Description |
| Attachment | 5 | TABLE II - Effluent Monitoring/Limitations |
| Attachment | 6 | Effluent Limitations/Monitoring Rationale/Suitable Data/Antidegradation/Antibacksliding |
| Attachment | 7 | Special Conditions Rationale |
| Attachment | 8 | Toxics Monitoring/Toxics Reduction/WET Limit Rationale |
| Attachment | 9 | Material Stored |
| Attachment | 10 | Receiving Waters Info./Tier Determination/STORET Data/Stream Modeling |
| Attachment | 11 | 303(d) Listed Segments |
| Attachment | 12 | TABLE III(a) and TABLE III(b) - Change Sheets |
| Attachment | 13 | NPDES Industrial Permit Rating Wrksht and EPA Permit Chklst |
| Attachment | 14 | Chronology Sheet |
| Attachment | | Public Participation |

APPLICATION COMPLETE: July 1, 2008 (VDH/dss comments on application)

7. **PERMIT CHARACTERIZATION:** (Check as many as appropriate)

| | |
|---|---|
| (X) Existing Discharge | (X) Effluent Limited |
| ( ) Proposed Discharge | ( ) Water Quality Limited |
| ( ) Municipal | ( ) WET Limit |
| SIC Code(s) NA | ( ) Interim Limits in Permit |
| (X) Industrial | ( ) Interim Limits in Other Document |
| SIC Code(s) 3731, 3732, 4499 | ( ) Compliance Schedule Required |
| ( ) POTW | ( ) Site Specific WQ Criteria |
| ( ) PVOTW | ( ) Variance to WQ Standards |
| (X) Private | ( ) Water Effects Ratio |
| ( ) Federal | (X) Discharge to 303(d) Listed Segment |
| ( ) State | (X) Toxics Management Program Required |
| ( ) Publicly-Owned Industrial | ( ) Toxics Reduction Evaluation |
| ( ) Pretreatment Program Req'd | (X) Storm Water Management Plan |
| ( ) Possible Interstate Effect | ( ) CBP Significant Dischargers List |

8. **RECEIVING WATERS CLASSIFICATION:** River basin information.

Outfall No(s): 001/901, 002/902, 003/903, 004/904 (conventional marine railways)
005 (storm water runoff, upland areas)

Receiving Stream: Elizabeth River, Western Branch
River Mile: 2-WBE000.57, 2-WBE000.58, 2-WBE000.63, 2-WBE000.70, 2-WBE000.68
Basin: James River (Lower)
Subbasin: N/A
Section: 1
Class: II
Special Standard(s): a, z
Tidal: YES

7-Day/10-Year Low Flow: N/A
1-Day/10-Year Low Flow: N/A
30-Day/5-Year Low Flow: N/A
Harmonic Mean Flow: N/A

9. **FACILITY DESCRIPTION:** Describe the type facility from which the discharges originate.

EXISTING industrial discharge resulting from the permittee's operation of a medium sized full-service shipyard. The permittee operates four conventional marine railways at the facility located on the bank of the Western Branch of the Elizabeth River near its confluence with the main stem of the Elizabeth River. Additional information will appear in Attachment 6.

10. **LICENSED OPERATOR REQUIREMENTS:** (X) No

11. **RELIABILITY CLASS:** Industrial Facility - NA

12. **SITE INSPECTION DATE:** a) 06/20/08 b) 03/19/08 c) 10/26/07 **REPORT DATE:** 06/20/08 03/24/08 11/07/07

**Performed By:** a), b) M. Kidd, c) S. Long

**SEE ATTACHMENT: 1**

The a) inspection was performed for compliance assistance and to observe numerous site improvements. The b) and c) inspections were performed as reconnaissance to determine if industrial activities were compliant with permit requirements.

13. **DISCHARGE(S) LOCATION DESCRIPTION:** Provide USGS Topo which indicates the discharge location, significant (large) discharger(s) to the receiving stream, water intakes, and other items of interest.

Name of Topo: Norfolk South Topo Quadrant No.: 035D

**SEE ATTACHMENT: 2**

14. **ATTACH A SCHEMATIC OF THE WASTEWATER TREATMENT SYSTEM(S):** For industrial facilities, provide a general description of the production cycle(s) and activities. For municipal facilities, provide a general description of the treatment provided.

**Narrative:**

**SEE ATTACHMENT: 3**

15. **DISCHARGE DESCRIPTION:** Describe each discharge originating from this facility.

**SEE ATTACHMENT: 4**

16. **COMBINED TOTAL FLOW:**

TOTAL: 0.105 MGD (sum of each railway's max flow during permit term)

PROCESS FLOW: 0.105 MGD

NONPROCESS/RAINFALL DEPENDENT FLOW: present at each railway, but not monitored or measured

17. **STATUTORY OR REGULATORY BASIS FOR EFFLUENT LIMITATIONS AND SPECIAL CONDITIONS:** (Check all which are appropriate)

- X State Water Control Law
- X Clean Water Act
- X VPDES Permit Regulation (9 VAC 25-31-10 et seq.)
- X EPA NPDES Regulation (Federal Register)
- ___ EPA Effluent Guidelines (40 CFR 133 or 400 - 471)
- X Water Quality Standards (9 VAC 25-260-5 et seq.)
- ___ Wasteload Allocation from a TMDL or River Basin Plan

18. **EFFLUENT LIMITATIONS/MONITORING:** Provide all limitations and monitoring requirements being placed on each outfall.

**SEE ATTACHMENT: 5**

19. **EFFLUENT LIMITATIONS/MONITORING RATIONALE:** Attach any analyses of an outfall by individual toxic parameter. As a minimum, it will include: statistics summary (number of data values, quantification level, expected value, variance, covariance, 97th percentile, and statistical method); wasteload allocation (acute, chronic and human health); effluent limitations determination; input data listing. Include all calculations used for each outfall and set of effluent limits and those used in any model(s). Include all calculations/documentation of any antidegradation or anti-backsliding issues in the development of any limitations; complete the review statements below. Provide a rationale for limiting internal waste streams and indicator pollutants. Attach chlorine mass balance calculations, if performed. Attach any additional information used to develop the limitations, including any applicable water quality standards calculations (acute, chronic and human health).

**OTHER CONSIDERATIONS IN LIMITATIONS DEVELOPMENT:**

**VARIANCES/ALTERNATE LIMITATIONS:** Provide justification or refutation rationale for requested variances or alternatives to required permit conditions/limitations. This includes, but is not limited to: waivers from testing requirements; variances from technology guidelines or water quality standards; WER/translator study consideration; variances from standard permit limits/conditions.

**SUITABLE DATA**: In what, if any, effluent data were considered in the establishment of effluent limitations and provide all appropriate information/calculations.

All suitable effluent data were reviewed

**ANTIDEGRADATION REVIEW**: Provide all appropriate information/calculations for the antidegradation review.

The receiving stream has been classified as tier 1; therefore, no further review is needed. Permit limits have been established by determining wasteload allocations which will result in attaining and/or maintaining all water quality criteria which apply to the receiving stream, including narrative criteria. These wasteload allocations will provide for the protection and maintenance of all existing uses

**ANTIBACKSLIDING REVIEW**: Indicate if antibacksliding applies to this permit and, if so, provide all appropriate information.

There are no backsliding issues to address in this permit (i.e., limits as stringent or more stringent when compared to the previous permit).

**SEE ATTACHMENT: 6**

20. **SPECIAL CONDITIONS RATIONALE**: Provide a rationale for each of the permit's special conditions.

**SEE ATTACHMENT: 7**

21. **TOXICS MONITORING/TOXICS REDUCTION AND WET LIMIT SPECIAL CONDITIONS RATIONALE**: Provide the justification for any toxics monitoring program and/or toxics reduction program and WET limit.

**SEE ATTACHMENT: 8**

22. **SLUDGE DISPOSAL PLAN**: Provide a description of the sludge disposal plan (e.g., type sludge, treatment provided and disposal method). Indicate if any of the plan elements are included within the permit.

N/A

23. **MATERIAL STORED**: List the type and quantity of wastes, fluids, or pollutants being stored at this facility. Briefly describe the storage facilities and list, if any, measures taken to prevent the stored material from reaching State waters.

**SEE ATTACHMENT: 9**

24. **RECEIVING WATERS INFORMATION**: Refer to the State Water Control Board's Water Quality Standards (e.g., River Basin Section Tables (9 VAC 25-260-5 et seq.). **Use 9 VAC 25-260-140 C (introduction and numbered paragraph) to address tidal waters where fresh water standards would be applied or transitional waters where the most stringent of fresh or salt water standards would be applied.** Attach any memoranda or other information which helped to develop permit conditions (i.e. tier determinations, PReP complaints, special water quality studies, STORET data and other biological and/or chemical data, etc.

**SEE ATTACHMENT: 10**

25 **305(b)/303(d) Listed Segments:** Indicate if the facility discharges to a segment that is listed on the current 303(d) list and, if so, provide all appropriate information/calculations.

This facility discharges directly to Western Branch of the Elizabeth River. This receiving stream segment has been listed in Category 5 of the 305(b)/303(d) list for non-attainment of estuarine bioassessments, open water dissolved oxygen, open water dissolved oxygen – aquatic life, enterococcus, and PCB in fish tissue. A TMDL has not been prepared or approved for these impairments in this stream segment. The permit contains a TMDL reopener clause which will allow the it to be modified, in compliance with Section 303(d)(4) of the Act once TMDL(s) for the causes of the noted impairments are approved.

**SEE ATTACHMENT: 11**

26. **CHANGES TO PERMIT:** Use **TABLE III(a)** to record any changes from the previous permit and the rationale for those changes. Use **TABLE III(b)** to record any changes made to the permit during the permit processing period and the rationale for those changes [i.e., use for comments from the applicant, VDH, EPA, other agencies and/or the public where comments resulted in changes to the permit limitations or any other changes associated with the special conditions or reporting requirements].

**SEE ATTACHMENT: 12**

27. **NPDES INDUSTRIAL PERMIT RATING WORKSHEET:**

**TOTAL SCORE:** 63

**SEE ATTACHMENT: 13**

28. **DEQ PLANNING COMMENTS RECEIVED ON DRAFT PERMIT:** Document any comments received from DEQ planning.

The discharge is not addressed in any planning document but will be included when the plan is updated.

29. **PUBLIC PARTICIPATION:** Document comments/responses received during the public participation process. If comments/responses provided, especially if they result in changes to the permit, place in the attachment.

**VDH/DSS COMMENTS RECEIVED ON DRAFT PERMIT:** Document any comments received from the Virginia Dept. of Health and the Div. of Shellfish Sanitation and noted how resolved.

The VDH reviewed the application and waived their right to comment and/or object on the adequacy of the draft permit.

**EPA COMMENTS RECEIVED ON DRAFT PERMIT:** Document any comments received from the U.S. Environmental Protection Agency and noted how resolved.

EPA waived the right to comment and/or object to the adequacy of the draft permit.

**ADJACENT STATE COMMENTS RECEIVED ON DRAFT PERMIT:** Document any comments received from an adjacent state and noted how resolved.

Not Applicable.

**OTHER AGENCY COMMENTS RECEIVED ON DRAFT PERMIT:** Document any comments received from any other agencies (e.g., VIMS, VMRC, DGIF, etc.) and noted how resolved.

Not Applicable.

**OTHER COMMENTS RECEIVED FROM RIPARIAN OWNERS/CITIZENS ON DRAFT PERMIT:**

Document any comments received from other sources and note how resolved.

The application and draft permit have received public notice in accordance with the VPDES Permit Regulation, and no comments were received.

**PUBLIC NOTICE INFORMATION:** Comment Period: Start Date December 17, 2009

End Date January 19, 2010

Persons may comment in writing or by e-mail to the DEQ on the proposed reissuance of the permit within 30 days from the date of the first notice. Address all comments to the contact person listed below. Written or e-mail comments shall include the name, address, and telephone number of the writer, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The Director of the DEQ may decide to hold a public hearing if public response is significant. Requests for public hearings shall state the reason why a hearing is requested, the nature of the issues proposed to be raised in the public hearing and a brief explanation of how the requestor's interests would be directly and adversely affected by the proposed permit action.

All pertinent information is on file and may be inspected, and arrangements made for copying by contacting C. D. Thomas at: Department of Environmental Quality (DEQ), Tidewater Regional Office, 5636 Southern Boulevard, Virginia Beach, VA 23462. Telephone: (757) 518-2161 E-mail: carl.thomas@deq.virginia.gov

Following the comment period, the Board will make a determination regarding the proposed reissuance. This determination will become effective, unless the Director grants a public hearing. Due notice of any public hearing will be given.

30. **ADDITIONAL FACT SHEET COMMENTS/PERTINENT INFORMATION:**

Content added 12/30/2009, to conform to procedures required to establish permit maintenance fee information.

For the permit action addressed by this fact sheet, this facility has been assigned the following classification for the purposes of determination of applicable permit processing and permit maintenance fees:

INDUSTRIAL MINOR - NO STANDARD LIMITS WITH INDUSTRIAL STORMWATER COMPONENT

The basis for the specific classification is:

This facility has fewer than five (5) process wastewater discharges. The permit contains a Toxics Management Program.

**PUBLIC NOTICE OF AN ENVIRONMENTAL PERMIT CITIZENS ARE**

PUBLIC NOTICE OF AN ENVIRONMENTAL PERMIT Citizens are invited to comment on a proposed permit that will allow the release of process wastewater, storm water runoff and ancillary discharges from a regulated industrial activity into a waterway in Portsmouth, Virginia. PUBLIC COMMENT PERIOD:Until 4:30 PM 30 days from the first date of this public notice December 17, 2009. PERMIT NAME: Virginia Pollutant Discharge Elimination System Permit. Owners or operators of facilities that discharge into Virginia waterways from a set location called a point source must apply for this permit. NAME ADDRESS AND PERMIT NUMBER OF APPLICANT:Associated Naval Architects, Incorporated, 3400 Shipwright Street, Portsmouth, Virginia 23703. NAME AND ADDRESS OF FACILITY: Same as above. DISCHARGE LOCATION/RECEIVING STREAM/WATERSHED:Portsmouth, Virginia; Western Branch of the Elizabeth River; James River (Lower) PROJECT DESCRIPTION:Associated Naval Architects, Incorporated has applied to the Department of Environmental Quality (DEQ) for the reissuance of a permit for process wastewaters, storm water runoff and ancillary discharges from a shipyard operating four conventional marine railways. The applicant proposes to discharge process wastewaters, at variable rates, depending on the scope of vessel maintenance required at each railway. The volume of storm water discharges are dependent on storm intensity and duration. The permit will limit the following pollutants to amounts that protect water quality - pH, prohibition on tributyltin use. TO COMMENT TO DEQ:Via e-mail or postal mail. You must include your name, address and telephone number plus the names and telephone numbers of any people you represent. DEQ must receive your comments during the comment period. The public may review permit documents at the Tidewater Regional Office every work day by appointment. You may request a public hearing via e-mail, fax or postal mail during the comment period. Requests for hearings must include the reason for the hearing request, the nature of the issue(s) to be raised in the public hearing, your interest and how the facility affects you. DEQ may hold a public hearing, including another comment period, if public response is significant and there are substantial, disputed issues relevant to the permit. CONTACT: Carl D. Thomas DEQ Tidewater Regional Office, 5636 Southern Blvd. Va. Beach 23462. Tel:(757) 518-2161; E-mail: carl.thomas@deq.virginia.gov VP Dec. 17 & 24, 2009 20889446

Appeared in: ***The Virginian Pilot*** on Thursday, 12/17/2009

# ATTACHMENT 1

# SITE INSPECTION REPORT/MEMORANDUM

| Facility: | ASSOCIATED NAVAL ARCHITECTS |
|---|---|
| County/city: | PORTSMOUTH |

| VPDES NO. | VA0087599 |
|---|---|

# DEPARTMENT OF ENVIRONMENTAL QUALITY
# WASTEWATER FACILITY
# INSPECTION REPORT
# PART 1

| | | | |
|---|---|---|---|
| Inspection date: | **June 20, 2008** | Date form completed: | **June 20, 2008** |
| Inspection by: | **Mark R. Kidd** | Inspection agency: | **DEQ/TRO** |
| Time spent: | | Announced Inspection: | [X] Yes [ ] No |
| Reviewed by: **Kenneth T. Raum** | | Photographs taken at site? | [X] Yes [ ] No |
| Present at inspection: | **Paul Smith – DEQ, Bill Espich and Al Payne - ANA** | | |

| FACILITY TYPE: | FACILITY CLASS: |
|---|---|
| ( ) Municipal | ( ) Major |
| (X) Industrial | (X) Minor |
| ( ) Federal | ( ) Small |
| ( ) VPA/NDC | ( ) High Priority ( ) Low Priority |

| TYPE OF INSPECTION: | | | | | |
|---|---|---|---|---|---|
| Routine | | Reinspection | | Compliance/assistance/complaint | X |
| Date of previous inspection: | March 19. 2008 | Agency: | DEQ/TRO | | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Population Served: | | Connections Served | | | | | | |
| Last Month Average: Influent | $BOD_5$ (mg/l) | | TSS (mg/l) | | Flow (MGD) | | | |
| | Other: | | | | | | | |
| Last Month Average: Effluent | $BOD_5$ (mg/l) | | TSS (mg/l) | | Flow (MGD) | | $NH_3$ (mg/l) | |
| | Other: | | | | | | | |
| Last Quarter Average: Effluent | $BOD_5$ (mg/l) | | TSS (mg/l) | | Flow (MGD) | | $NH_3$ (mg/l) | |
| | Other: | | | | | | | |

| | | | | |
|---|---|---|---|---|
| Data verified in preface: | Updated? | | NO CHANGES? | |
| Has there been any new construction? | | YES | | NO |
| If yes, were the plans and specifications approved? | | YES | | NO |
| DEQ approval date: | | | | |

**COPIES TO:** (x) DEQ/TRO; (x) DEQ/OWCP; (x) OWNER; ( ) OPERATOR; ( ) EPA-Region III; ( ) Other:

Associated Naval Architects

| | PROBLEMS IDENTIFIED AT LAST INSPECTION: | CORRECTED | NOT CORRECTED |
|---|---|---|---|
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## SUMMARY

| | INSPECTION COMMENTS: |
|---|---|
| | A site survey was conducted In conjunction with Paul Smith of the Enforcement Division in response to an invitation from Bill Espich. The purpose of the visit was to evaluate improvements made at the facility in order to meet Permit requirements. |
| | The facility has installed and is evaluating the use of concrete blocks (Photos 1-3) to control abrasive blast material (ABM) at Railway #4. This Best Management Practice (BMP) may be used at the other three railways if the BMP proves environmentally and economically effective. |
| | Filter material (Photos 4-5) is now in place in the scuppers on the outfitting pier. This appears to be capturing ABM that could have flowed into the river. |
| | The area around the central drop inlet (Photo 6) has been cleaned and grading will be completed to capture storm water runoff. |
| | As discussed during the site visit, the activities and BMP's noted above appear to upgrade the management of storm water runoff from the site. The Storm Water Pollution Prevention Plan (SWP3) must be updated to reflect current activities and storm water practices. Also, maintenance requirements for the structural BMP's should be documented in the SWP3. |
| | The facility continues to improve housekeeping, container management, and storm water management since the inspections performed on October 26, 2007. Mr. Espich and Mr. Payne are commended for their efforts in correcting previous deficiencies. |
| | ANA has applied for the re-issuance of Permit VA0087599. DEQ Inspection staff has offered to provide additional compliance assistance to ANA when the Permit is re-issued. |
| | |

| | COMPLIANCE RECOMMENDATIONS FOR ACTION |
|---|---|
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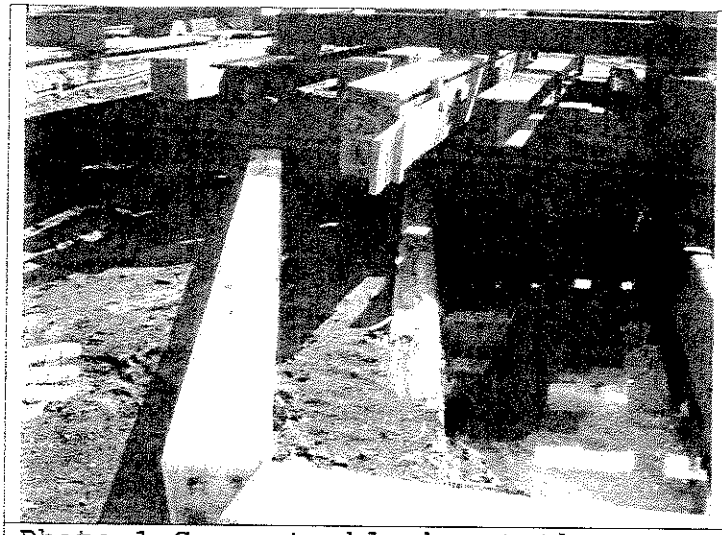


Photo 1.Concrete blocks at the west side of Railway #4.

Photo 2.Another view of Railway #4.

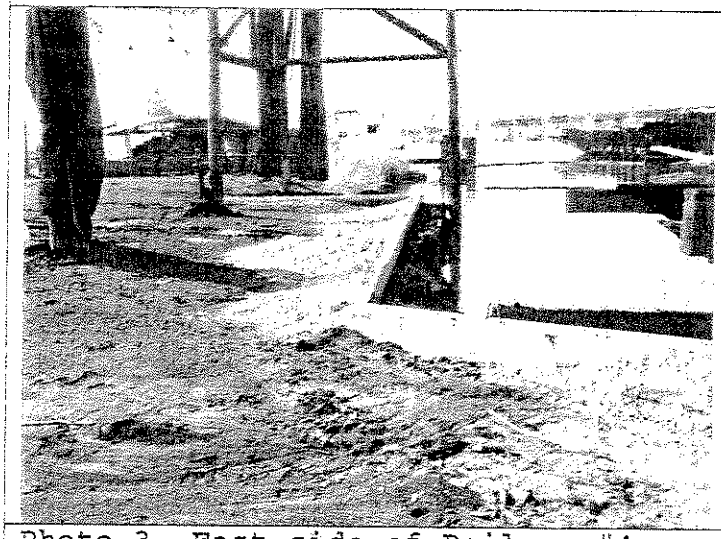


Photo 3. East side of Railway #4.

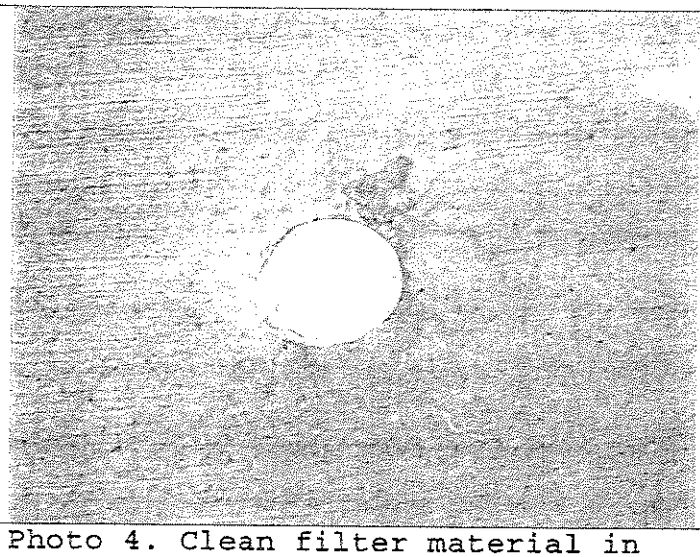


Photo 4. Clean filter material in scuppers of the outfitting pier.

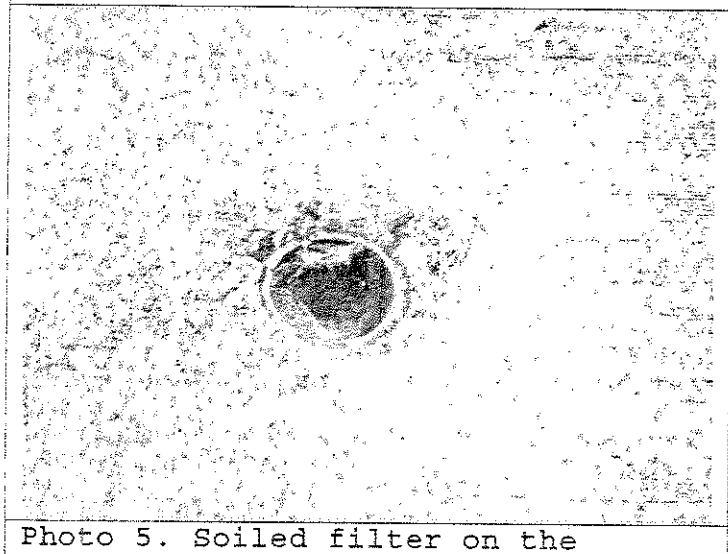


Photo 5. Soiled filter on the outfitting pier.

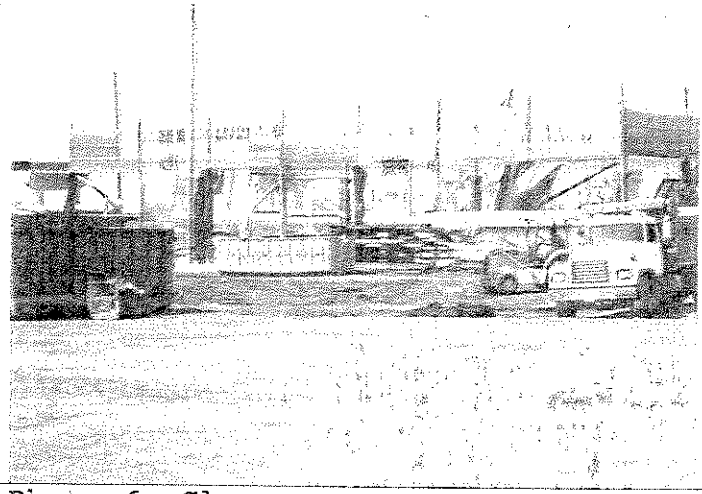


Photo 6. Clean-up and grading around the central drop inlet on site.

# COMMONWEALTH OF VIRGINIA
## DEPARTMENT OF ENVIRONMENTAL QUALITY
## TIDEWATER REGIONAL OFFICE
## 5636 SOUTHERN BOULEVARD
## VIRGINIA BEACH, VIRGINIA 23462
# RECONNAISSANCE INSPECTION REPORT

| | |
|---|---|
| FACILITY NAME: **Associated Naval Architects** | PERMIT NUMBER: **VA0087599** |
| FACILITY ADDRESS: **3400 Shipwright St. Portsmouth, VA 23703** | |
| INSPECTION DATE: **March 19, 2008** | REPORT DATE: **March 24, 2008** |
| INSPECTOR: **Mark R. Kidd** | REVIEWER: **Kenneth T. Raum** KTR |
| PRESENT AT INSPECTION: **John Brandt and Paul Smith – DEQ**<br>**Bill Espich, Al Payne, Jim Axeley, and Rick Davis – ANA**<br>**Marina Phillips – Kaufman & Canole** | |

## GENERAL OBSERVATIONS

**This Reconnaissance Inspection was conducted in conjunction with DEQ Enforcement Section staff to assess current site conditions relative to the conditions observed during the inspection performed by Steve Long of DEQ on October 26, 2007.**

**A site survey was conducted with the assistance of ANA personnel. According to company records, over 2100 tons of spent abrasive blast material (ABM) have been removed from the site, and loading of ABM was observed (Photo 7) during the inspection. Most bulkhead areas were observed to have material removed to a level below the bulkheads (Photos 5 & 10). Drainage along railway #3 (Photo 4) still needs to be addressed. Railway cradles appeared to be free of ABM (Photos 2 &9).The outfitting pier (Photo 6) was free of spent ABM. Railway outfall locations were secured with fresh hay bales (Photos 3&8) or restored to a functional state by the removal of ABM (Photo 1). Improved housekeeping was observed throughout the facility grounds. Waste bins were placed along each railway and work area and trash removal appeared improved. Container management also appeared to have improved since the previous inspection. Paint, solvent and lubricant containers were stored under cover or indoors. A waste oil tank (Photo 11) and oily water tank (Photo 12) had been moved under shelter and placed in secondary containment. The drop inlet located in the center of the facility was protected by hay bales and filter cloth (Photo 13). The addition of this outfall to the Permit was discussed with ANA.**

**Overall, housekeeping, container management, ABM management and marine railway drainage control had improved since the last inspection.**

## INSPECTION RECOMMENDATIONS

| | | | | |
|---|---|---|---|---|
| PHOTOGRAPHS TAKEN? (See next page.) | YES | x | NO | |

COPIES:

| | | | | | |
|---|---|---|---|---|---|
| TIDEWATER REGIONAL OFFICE | X | COMPLIANCE AUDITOR | X | OTHER | |
| V.D.H. - RICHMOND | | OWNER | X | OTHER | |
| OWCP | X | OPERATOR | | OTHER | |

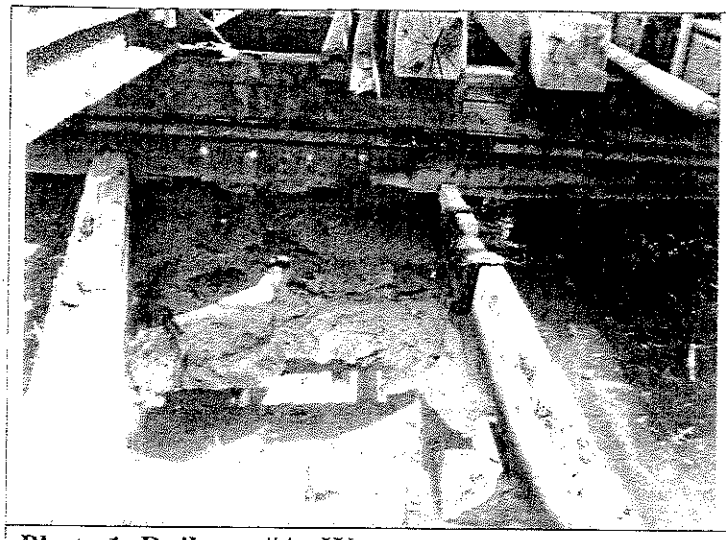


Photo 1. Railway #4 - West

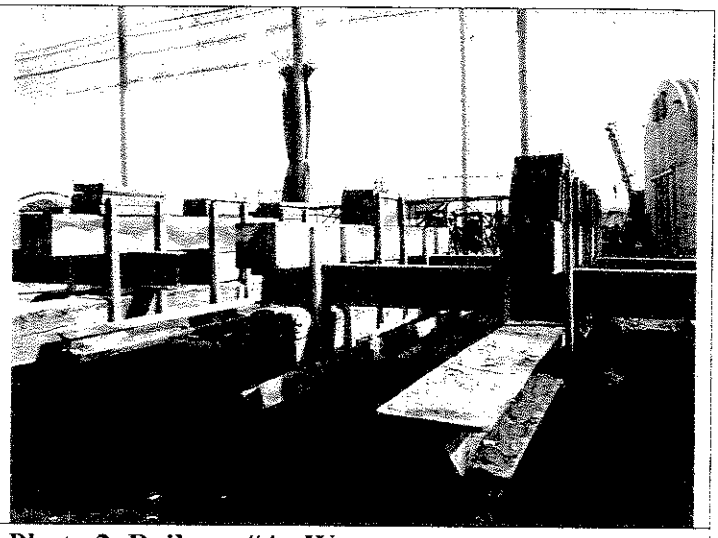


Photo 2. Railway #4 - West

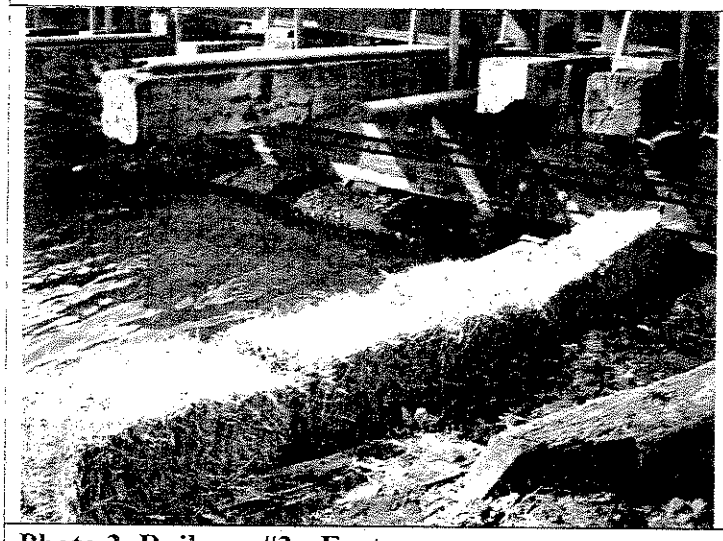


Photo 3. Railway #3 - East

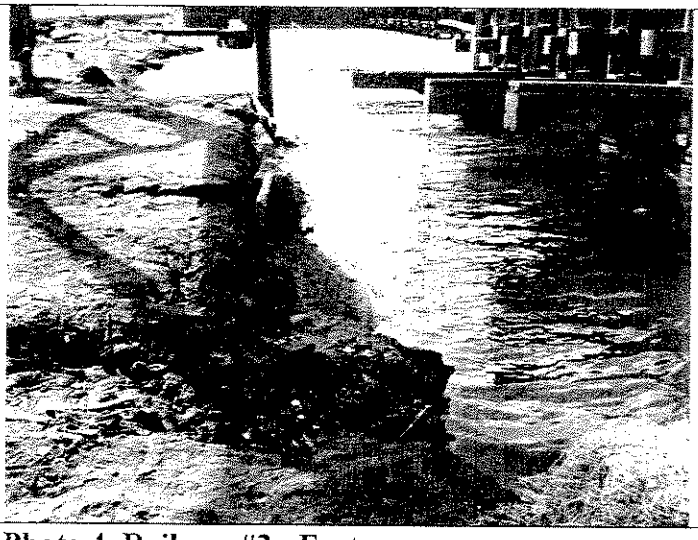


Photo 4. Railway #3 - East

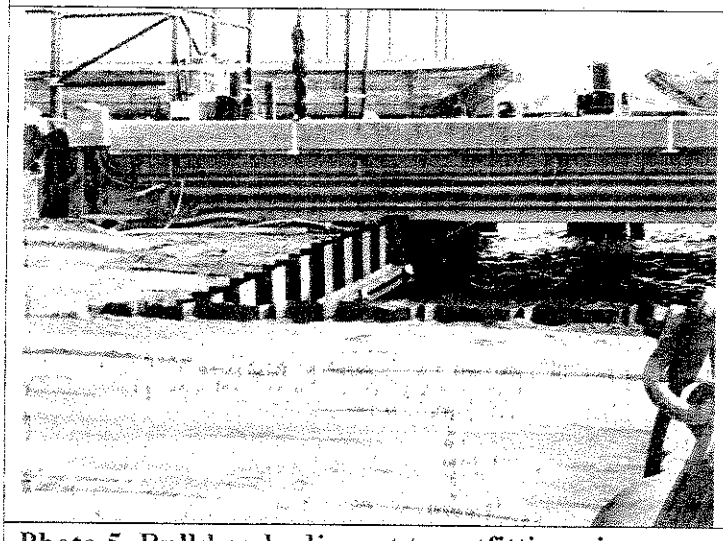


Photo 5. Bulkhead adjacent to outfitting pier.

Photo 6. Outfitting pier.

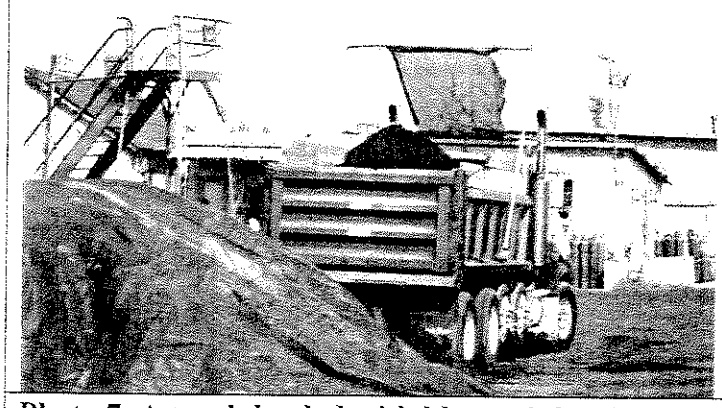


Photo 7. A truck loaded with blast grit leaving facility.

Photo 8. Railway #2.

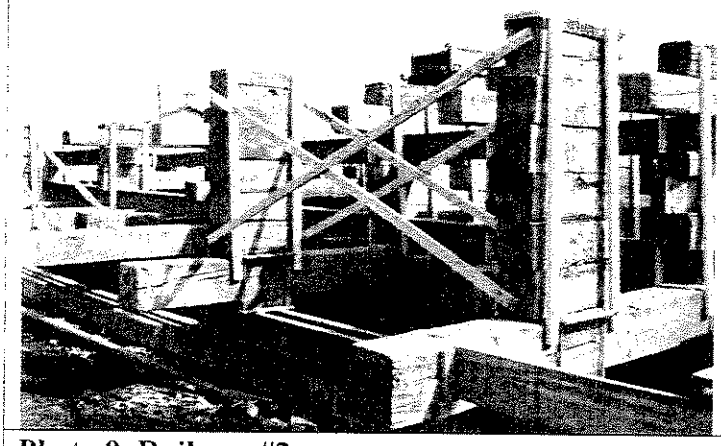


Photo 9. Railway #2.

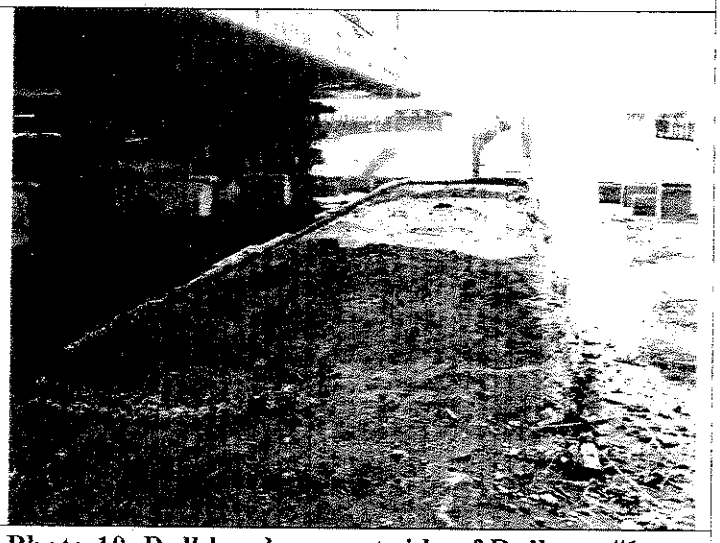


Photo 10. Bulkhead on west side of Railway #1.

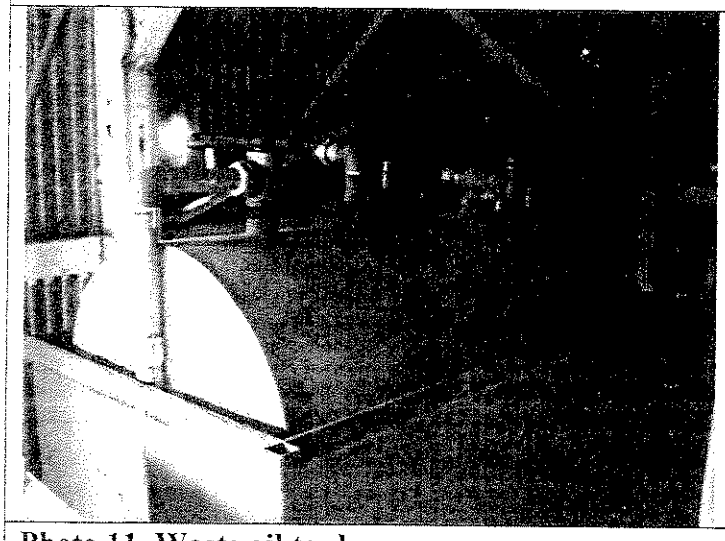


Photo 11. Waste oil tank.

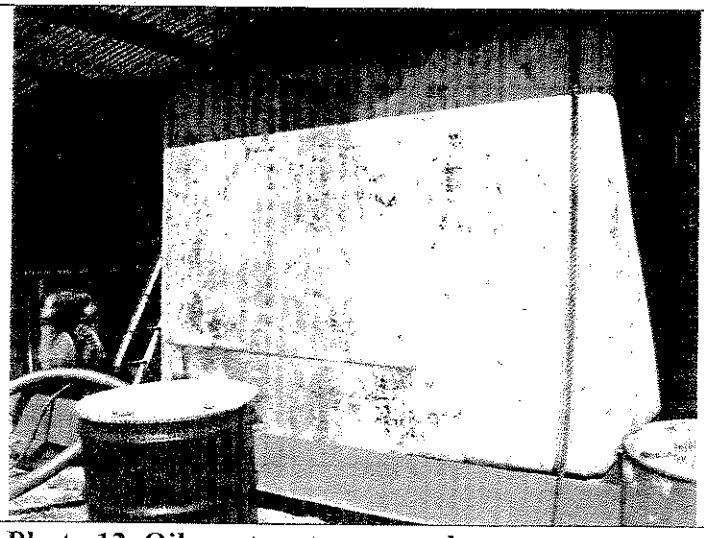


Photo 12. Oily water storage tank.

**Photo 13. Drop inlet in center of facility.**

# COMMONWEALTH OF VIRGINIA
## DEPARTMENT OF ENVIRONMENTAL QUALITY
## TIDEWATER REGIONAL OFFICE
## 5636 SOUTHERN BOULEVARD
## VIRGINIA BEACH, VIRGINIA 23462
# RECONNAISSANCE INSPECTION REPORT

| | |
|---|---|
| FACILITY NAME: **Associated Naval Architects** | PERMIT NUMBER: **VA0087599** |
| FACILITY ADDRESS:<br>**3400 Shipwright St.**<br>**Portsmouth, VA 23703** | MAILING ADDRESS: |
| INSPECTION DATES: **October 26, 2007** | REPORT DATE: **November 7, 2007** |
| INSPECTOR: **Steven J.E. Long , Brad White** | REVIEWER: **Kenneth T. Raum** KTR |
| PRESENT AT INSPECTION: **10/26/07: John Brandt, Paul Smith, Mark Kidd –DEQ, Brandt Everhart - ANA** | |

GENERAL OBSERVATIONS

**This site visit was performed in response to the visit on 9/20/07 and to allow the Enforcement staff and the new Compliance Inspector an opportunity to review the site conditions. Considering the conditions observed in September this visit provides an opportunity to compare the site from one month to the next. Staff arrived at this site on 10/26/07 at approximately 1030 and met with Mr. Everhart. The site visit performed on 9/20/07 was discussed with the photos from that visit provided to Mr. Everhart. Compliance issues for the site visit in September were reviewed with Mr. Everhart. During this time Mr. Everhart reported that he will likely be turning over the water permit compliance to other staff members to see if the compliance issues can be resolved. Mr. Everhart also noted that there is the potential for the site to close prior to the next permit term and may depend on how well compliance is achieved once it is reassigned.**

**Cards were provided to Mr. Everhart to pass onto those assuming permit compliance responsibilities with the hope that these employees would contact agency personnel for any questions or help in achieving compliance. It was stressed that though a change could be for the best, permit compliance must be supported by the management and owners of the company for the program to work.**

**The following is a review of the site visit performed in October with several comparisons to the conditions observed in September.**

**The site conditions observed since the inspection in September have not changed significantly and in several areas appear to be worse. Sandblast grit can still be observed entering the water at all marine railways. There does not appear to have been any significant clean up for this site in the month between visits. Typical BMP include cleaning the railway areas between vessels. The only vessel that appears to be the same is the tugboat on railway #3. Clean up between vessels does not seem to be occurring or is not significant enough to prevent the pollutants from entering the water.**

**Several containers were observed open and exposed to the rain including some that have filled with water. This indicates a poor housekeeping effort throughout the facility and an inspection program that is ineffective. The inspection should be finding and resolving these issues and good housekeeping should prevent the situation from occurring.**

**One container was observed with the label "Waste Oil" but had a significant odor of solvent. Other containers with hazardous waste labels were observed but did not have the accumulation date recorded.**

**Railway #4 had a barge on the railway, none of the shrouds were deployed. The barge again extends several feet beyond the high tide line with a similar length to the barge observed 9/20/07. Controls were not observed in place to prevent a discharge of pollutants though no work was being performed on the barge. The tide was unusually high during this visit.**

**The sandblast grit is still piled on top of the hay bales, some are completely covered. Erosion patterns can be seen in the blast grit with the recent rainfall for the last three days. The sandblast grit depth is at the edge of most bulkheads and will be deposited in the water with any rainfall and runoff. The barge is not the same as that observed 9/20/07 and the blast grit should have been cleaned up between the vessels. From the appearance of the hay bales, clean up has not occurred for sometime.**

**Sandblast can be observed in the water at several locations at the end of the erosion patterns and must be removed from the water and disposed of properly.**

**Trash removal around this railway does appear to have improved though several welding rods can be seen throughout the area.**

***THERE IS NO INDICATIONS THAT WORK TO CLEAN UP THE SANDBLAST FROM THIS RAILWAY HAS OCCURRED SINCE THE SEPTEMBER VISIT. WITH CONTINUED BLASTING AND LITTLE CONTROLS TO PREVENT THE LOSS OF THE BLAST GRIT, THIS POLLUTANT WILL CONTINUE TO ENTER STATE WATERS.***

GENERAL OBSERVATIONS (continued)

Railway #3 has a tugboat at the front of the railway, this appears to be the same or at least similar to the vessel observed 9/20/07. Closet to the water was the "West Bay" landing craft. The landing craft extends beyond the high tide mark.

Sandblast grit is being deposited into the water with several erosion patterns observed. One erosion rill had enough flow to start to undermine one portion of the railway. The bulkheads at the waterfront have sandblast grit built up at this location and will allow for this material to be easily deposited into the water. No controls for stopping the blast grit were observed on the western side of the railway. Two hay bales were observed on the eastern at the water front. Without full coverage across the railway, blast is not prevented from entering the water.

One of the bales was observed almost covered with grit. A review of this same bale on 9/20/07 shows that the blast grit was covering the bale only about halfway. This provides and indication to the amount of blast grit that has been lost to the river.

Shrouds have not been observed in the location at any time this inspector has made visits. There is one pole with a shroud observed on the eastern side of the railway at the waterfront but this has not been observed deployed.

***THERE ARE NO INDICATIONS THAT WORK TO CLEAN UP THE SANDBLAST FROM THIS RAILWAY HAS OCCURRED SINCE THE SEPTEMBER VISIT. WITH CONTINUED BLASTING AND INEFFECTIVE CONTROLS TO PREVENT THE LOSS OF THE BLAST GRIT, THIS POLLUTANT WILL CONTINUE TO ENTER STATE WATERS.***

Railway #2 has a landing craft with the hull number of 1664. This vessel extends beyond the water. Shrouds, as noted for railway #3, have never been observed in use at this location with only one pole with a shroud observed.

Nothing was observed at the waterfront to prevent the loss of the sandblast grit to the river. Several areas were observed with the blast material in the water. The bulkhead on the western side of the railway has piles of blast material at the waterfront.

One area between railways #2 and #3 did appear to be lower than the surrounding material. This could be the location that the blast material was gathered and then piled in front of railway #2. The area between railway #2 and #1 shows nothing but a beach of sandblast grit from the head of the railways to the waterfront. Trash around this area did appear to be better managed than that observed during the September visit.

***THERE WERE MINOR INDICATIONS THAT WORK TO CLEAN UP THE SANDBLAST FROM THIS RAILWAY HAS OCCURRED SINCE THE SEPTEMBER VISIT. THE AREA THAT APPEARS TO HAVE BEEN CLEANED UP STILL NEEDS ATTENTION AS DO ALL OTHER PORTIONS OF THE RAILWAY. WITH CONTINUED BLASTING AND INEFFECTIVE CONTROLS TO PREVENT THE LOSS OF THE BLAST GRIT, THIS POLLUTANT WILL CONTINUE TO ENTER STATE WATERS.***

Railway #1 has a barge in place. Nothing is in place to prevent the loss of the sandblast grit and there are no shrouds in use. Erosion patterns to the waterfront show where the blast material is being deposited into the water.

Used zinc anodes were observed near this area.

***THERE IS NO INDICATION THAT WORK TO CLEAN UP THE SANDBLAST FROM THIS RAILWAY HAS OCCURRED SINCE THE SEPTEMBER VISIT. WITH CONTINUED BLASTING AND INEFFECTIVE CONTROLS TO PREVENT THE LOSS OF THE BLAST GRIT, THIS POLLUTANT WILL CONTINUE TO ENTER STATE WATERS.***

Disposal of sandblast grit continues to be an issue. Mr. Everhart reported that several tons of material were returned to Virginia Materials, the supplier of the sandblast grit.

From the last site visit in December 2006 it was noted that clam shell dredging of the blast material had been performed and this material was shipped to Craney Island. This material should not be allowed to reach the waterfront in the first place. Once removed from the water, the sandblast grit should be handled as a solid waste versus dredge materials and should not be sent as such to Craney Island.

During this site visit a pile of sandblast blast grit was observed at the front of railway #2. This material was being picked up by a front-end loader and moved to the waterfront on the west side of railway #3. This material may have come from the area that appears to be dug out between railways #3 and #2.

When Mr. Everhart was asked about this activity he did not believe that it was occurring. Once it was determined that the material was being deposited near the waterfront, Mr. Everhart redirected the loading back to the front of railway #2.

This appears to be opposite to what would be expected with the blast materials removed from the railways and the waterfront in preparation for transportation off site.

GENERAL OBSERVATIONS (continued)

The concrete service pier between railways #3 and #4 along with the nearby area near the covered work building was observed and showed problems with control of the sandblast grit. The pier had sandblast grit covering the area adjacent to the work area. Previously, the materials that had been observed on the pier were reported to have been tracked onto the pier by vehicles. The amount of material that was observed during this visit, including the location and the distribution of this material, does not support that the material was tracked.

The work area near the covered building, as most of the waterfront areas, is covered with sandblast grit to the edge of the bulkhead. Shrouds are not in place to help keep the blast materials in the area of use. Several tanks/barge pieces that had just been painted are located at the work area near the pier. Hay bales near the edge of the pier, and adjacent to a work area, are covered with blast. The blast materials did not get tracked on top of these bales but likely were deposited during blasting operations. Several of the cross beams for the bulkhead, in the water, have blast material that has collected on the beams. From all indications of the surrounding area and the amount of material found on the pier, it is quite possible that this sandblast grit was deposited during blasting operations. If the blast material was able to be deposited to the pier, much of it also would be deposited directly to the water.

An issue repeatedly addressed in reports is the drop inlet in the middle of the facility that needs to be eliminated or included as an outfall.

This site continues to be inspected with little or no improvement in the site conditions. The few times that improvement are made, site conditions deteriorate with continued work.

The BMP weekly audit program, required by the permit is not adequately finding the problems or actually documenting that there are issues. For those times that problems are identified the records do not reflect that clean up has been performed. For the three records obtained during this visit, several questions have been answered that would indicate problems but nothing has been done.

The 10/5/07 inspection provided:
Is railway cradle cleaned before launch? Answered with a circled NO. Is railway tidal area cleaned regularly. Answered with a circled NO. It also notes "Trash #1,2 Blast on #2 railway. Corrective actions for these problems were not provided.

The 10/12/07 inspection provided:
Is railway tidal area cleaned regularly. Answered with a circled NO. The document notes RW, 1, RWY 4 Trash, had it cleaned up.

The 10/15/07 inspection provided answers to the following question all to be NO. The two groups of questions separated below had all the "NO" circled with only one circle versus individual circles for each question. It is likely that the inspector did not pay attention to what was being recorded. Otherwise this was actually documenting problems that should have been further detailed along with the corrective actions. That was not done.

Work on overhead areas conducted in a manner to prevent pollutants from entering the water?

Are liquid materials stored in a location and manner to prevent spills/discharges? Is paint missing and cleanup conducted in a controlled area? Is containment used under mixing and cleanup locations? Have spills, if any, been cleaned up immediately?

Are oils, fuels and lubricants stored in a location and manner to prevent spills/discharges? Are drip pans used under connections for oily waste transfers? Are oily materials removed from waterfront areas quickly? Have spills, if any, been cleaned up immediately? (See copy of the inspection record.)

Notes provide: Hay bales need replacement. This inspection was performed on Monday with the last inspection performed on Friday. No mention of hay bales was provided for the Friday document.

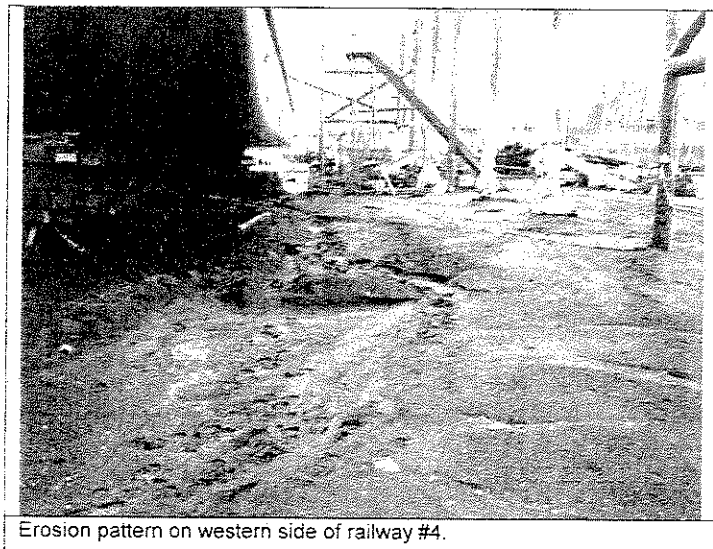
INSPECTION RECOMMENDATIONS

Refer to Enforcement for further actions.

| | | | |
|---|---|---|---|
| PHOTOGRAPHS TAKEN? (See next page.) | YES | √ | NO |

COPIES:

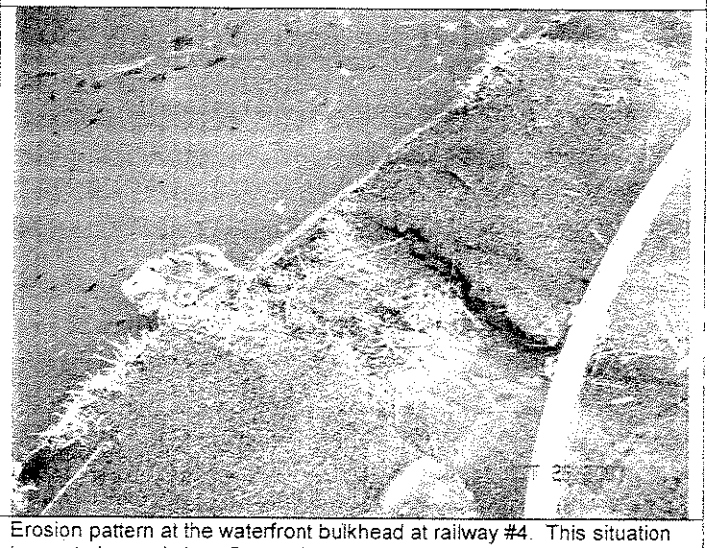
| | | | | | |
|---|---|---|---|---|---|
| TIDEWATER REGIONAL OFFICE | √ | COMPLIANCE AUDITOR | √ | OTHER | |
| D.H. - RICHMOND | | OWNER | √ | OTHER | |
| OWCP | √ | OPERATOR | | OTHER | |



Erosion pattern on western side of railway #4.

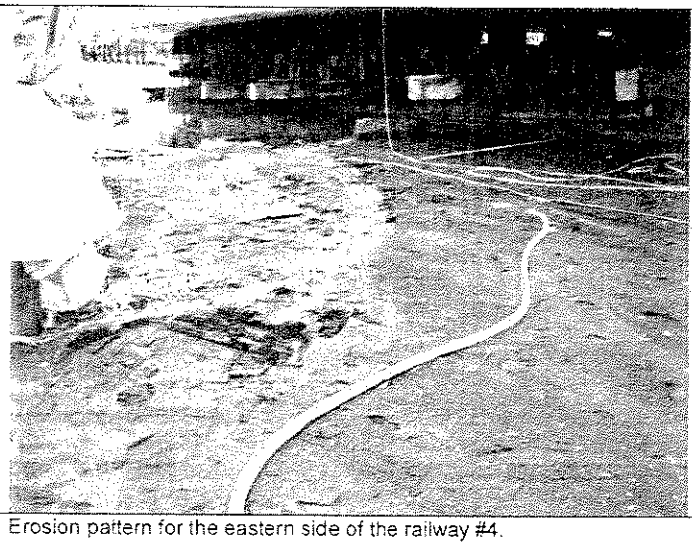
Trash and debris observed at railway #4 including several welding rods.

End or railway with hay bales in place. Some blast materials is making it through this since it has not be well maintained.

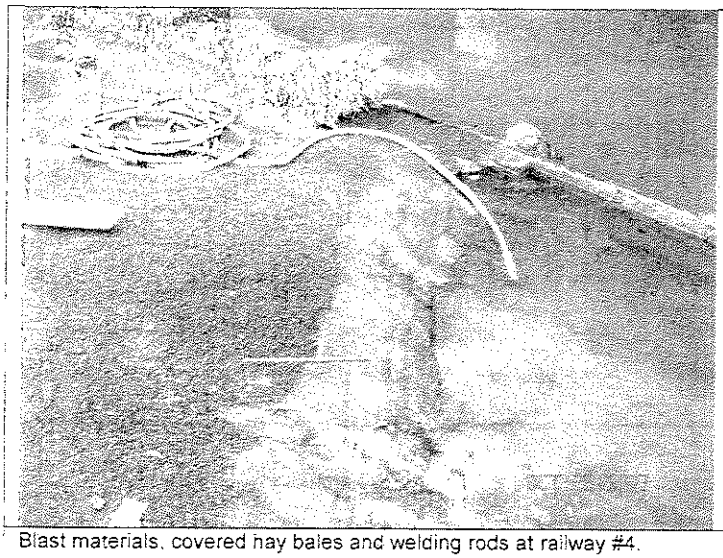


Erosion pattern at the waterfront bulkhead at railway #4. This situation has not changed since September.

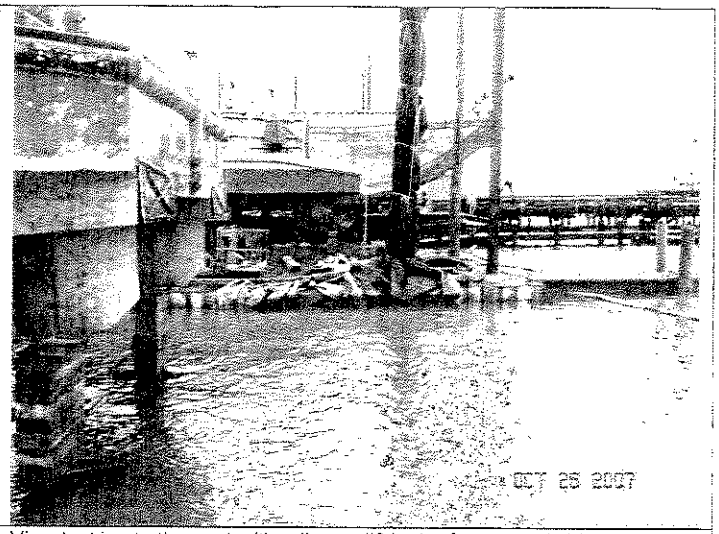
Sandblast grit in the water.



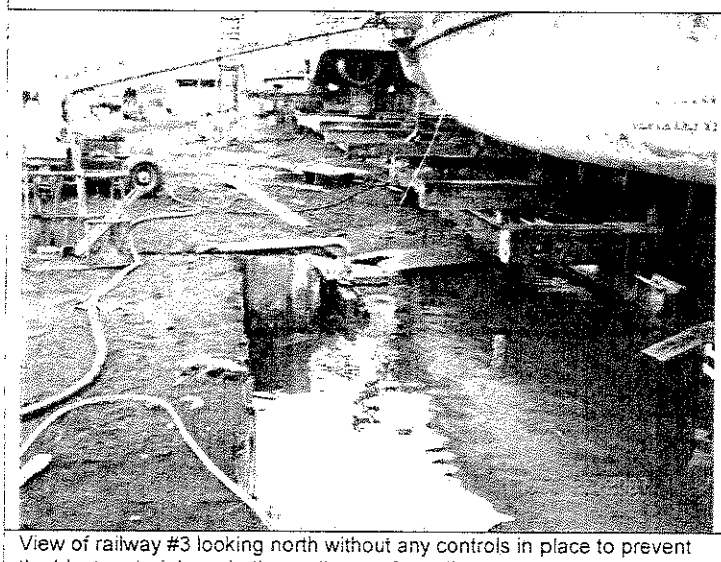
Erosion pattern for the eastern side of the railway #4.



Blast materials, covered hay bales and welding rods at railway #4.

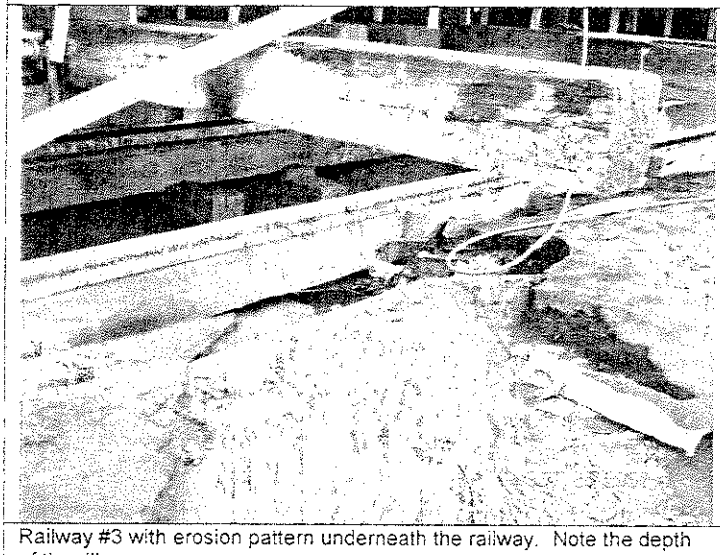



View looking to the east with railways #3 in the foreground, #2 in the middle and #1 in the background. All of these vessels are overhanging the water.

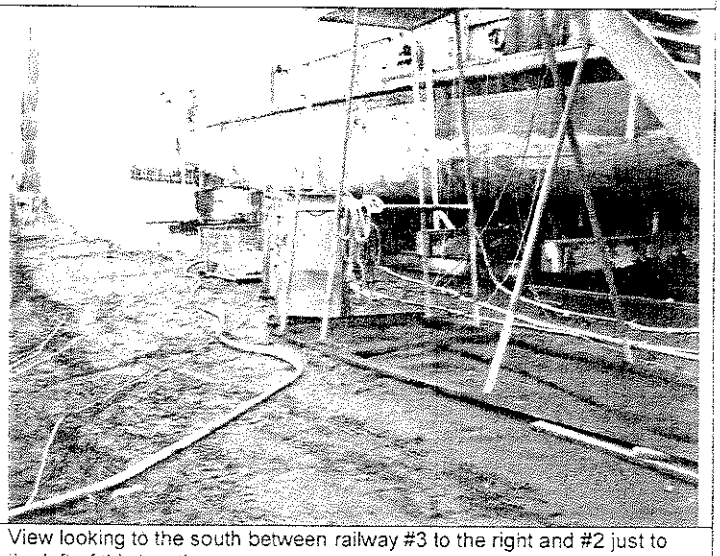


View of railway #3 looking north without any controls in place to prevent the blast materials and other pollutants from discharging.

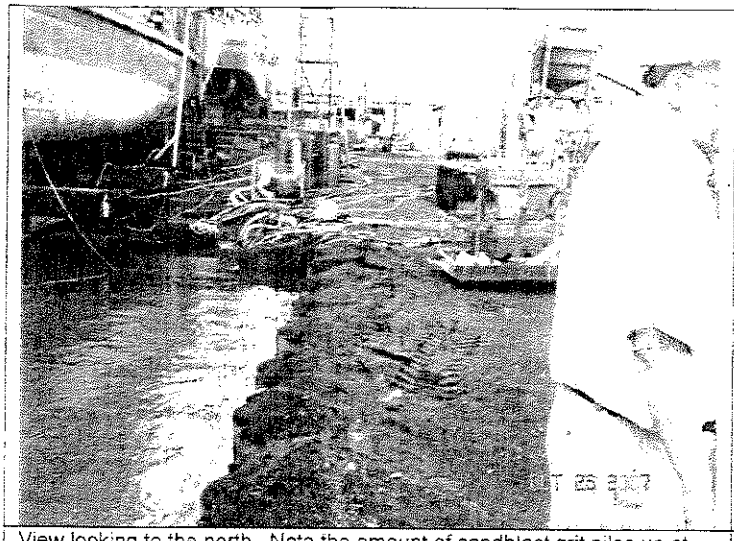
Erosion rill at railway#3. Sandblast grit easily makes it to the water since this is above the lip of the bulkhead.



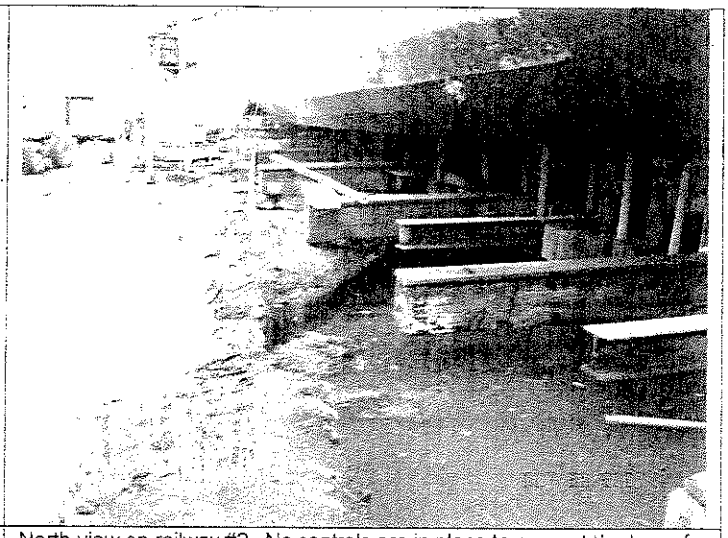
Railway #3 with erosion pattern underneath the railway. Note the depth of the rill.



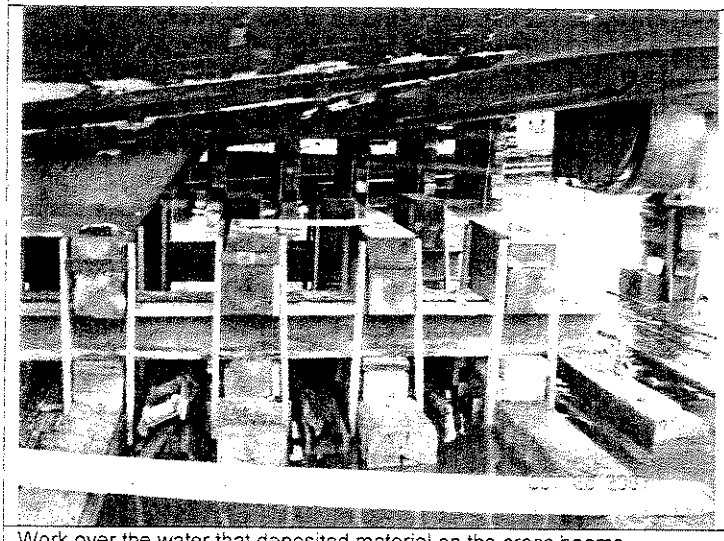
View looking to the south between railway #3 to the right and #2 just to the left of this location.



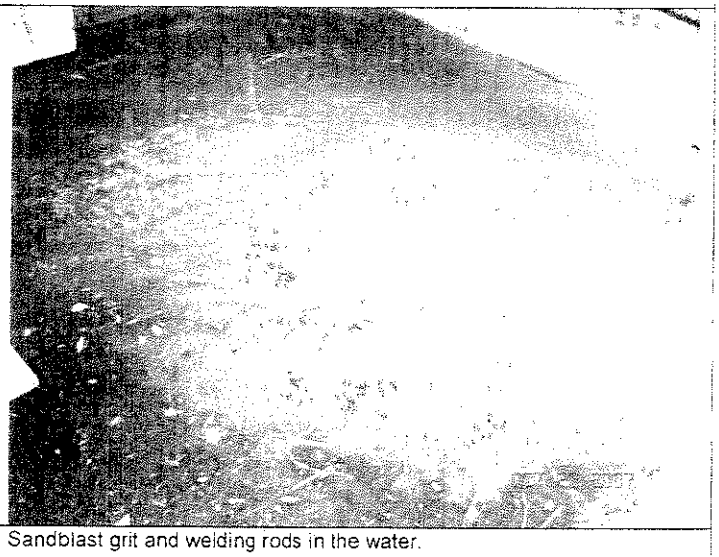
View looking to the north. Note the amount of sandblast grit piles up at the bulkhead area. This material can be discharged to the water with wind or rainfall.



North view on railway #2. No controls are in place to prevent the loss of the sandblast grit.

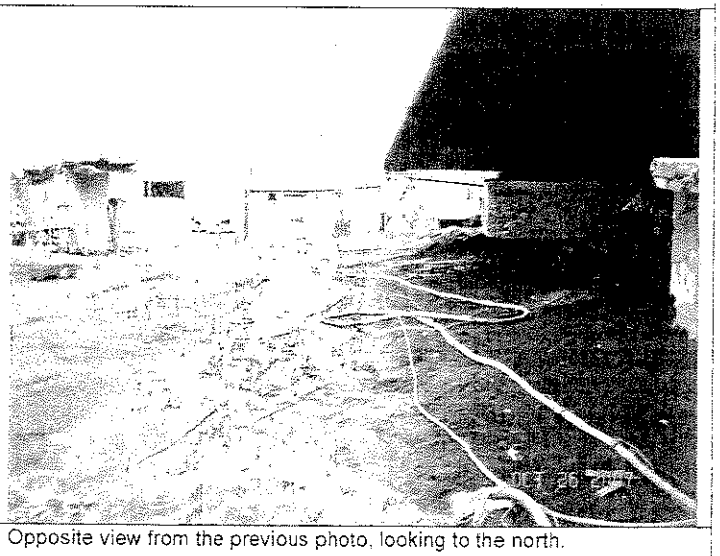


Work over the water that deposited material on the cross beams. Unknown if steps were taken to prevent this material from falling in to the water.



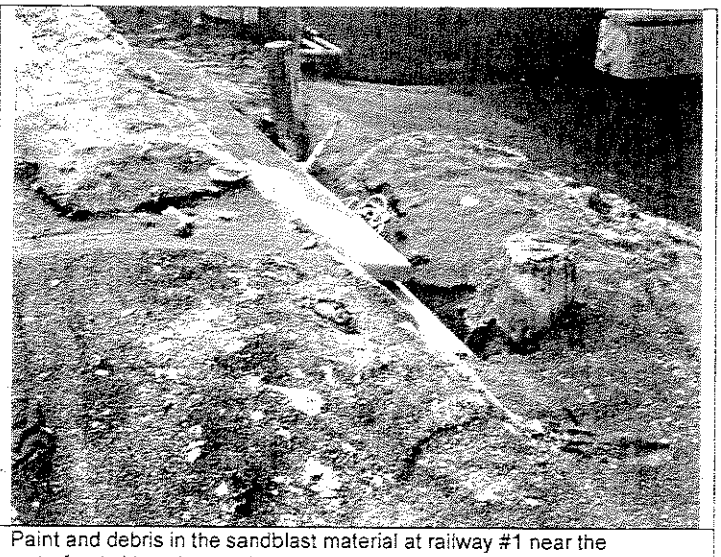
Sandblast grit and welding rods in the water.

Area between railways #2, on the right and #1. All of this area is covered with sandblast grit from the head of the railways to the water. No controls are in place to prevent pollutant discharges.



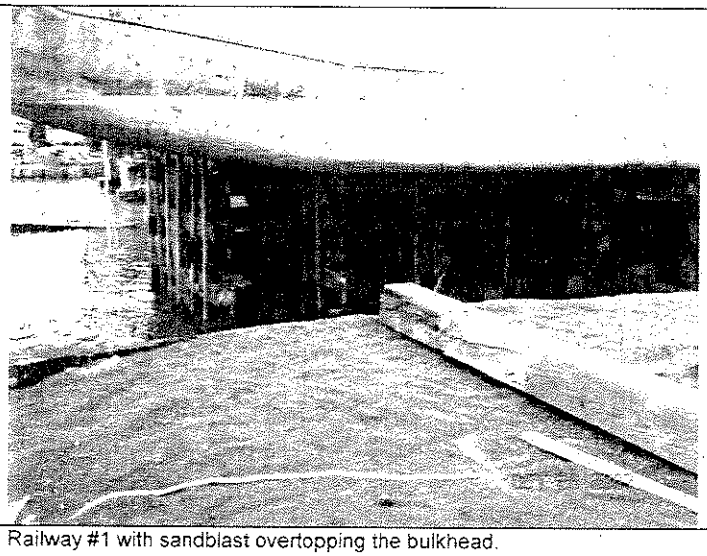
Opposite view from the previous photo, looking to the north.

View along railway #1 on the eastern side.

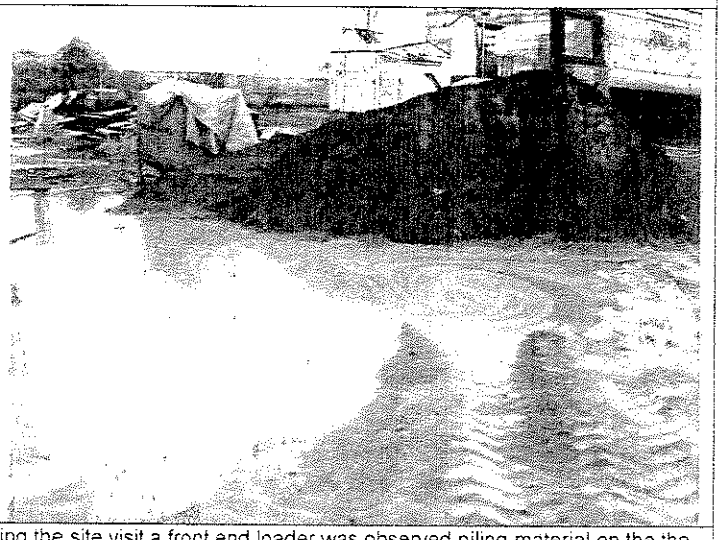


Paint and debris in the sandblast material at railway #1 near the waterfront. Note the erosion patterns going towards the water.

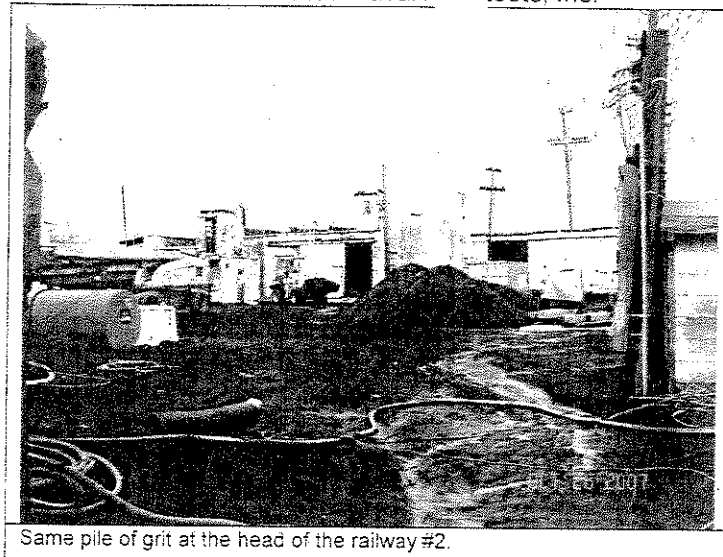

This area can be seen in the photo above and is to the left of the small building at the pier. The fact that the sandblast grit is making it to this location provides indications of little or no control in keeping the sandblast material near the areas of use.



Railway #1 with sandblast overtopping the bulkhead.



The photo on the left shows the pile of grit between railways #3 and #2. During the site visit a front end loader was observed piling material on the the pile. It appeared to be coming from the pile shown on the right, located at the head of railway #2. Facility personnel could not explain why this material was being moved to the water front verses a location for transport off site.

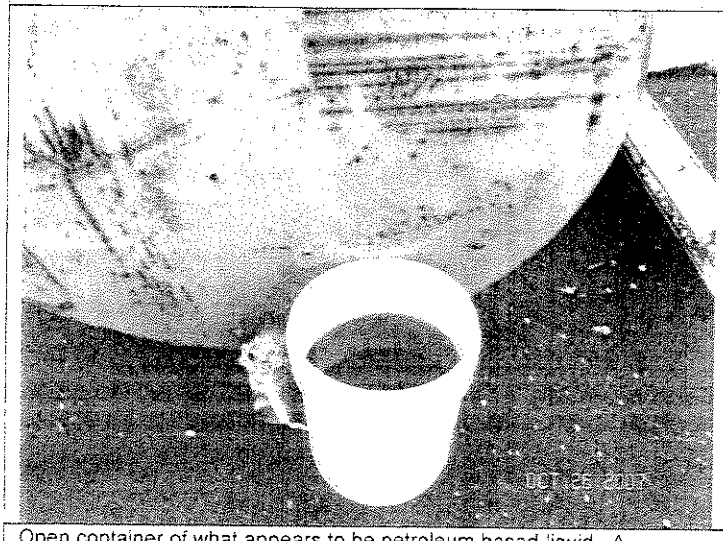


Same pile of grit at the head of the railway #2.

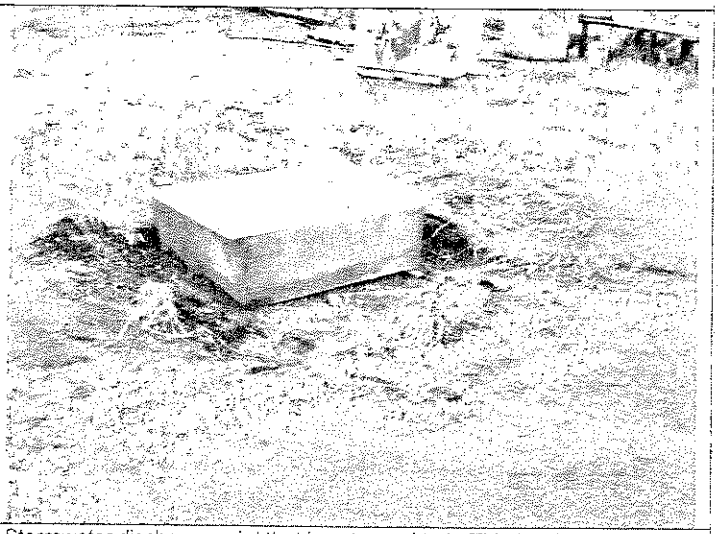

Drum marked waste oil though a strong solvent smell was assessed when the lid was lifted.

Open containers filled with water. This is just one example that was observed in several locations.

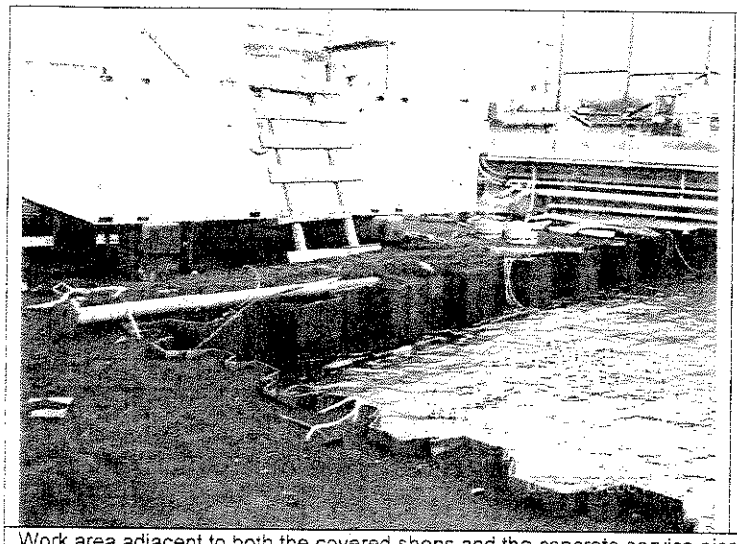
This bucket was observed in the exact same location during the September site visit.

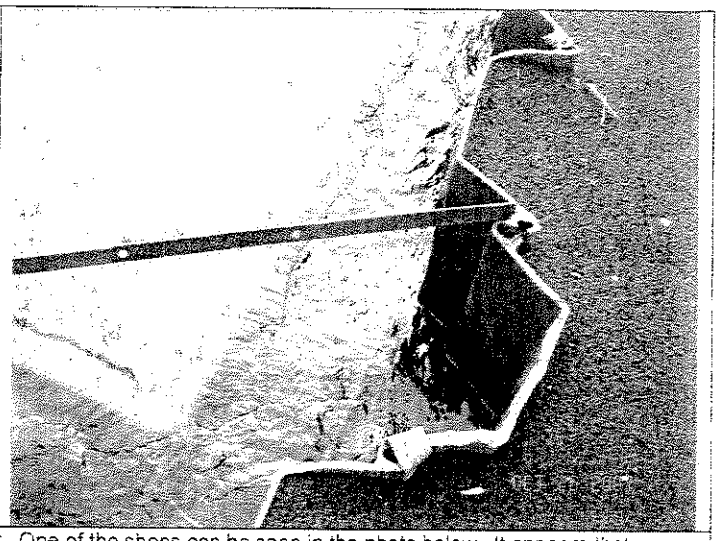


Open container of what appears to be petroleum based liquid. A lead/acid battery was also found near this location.

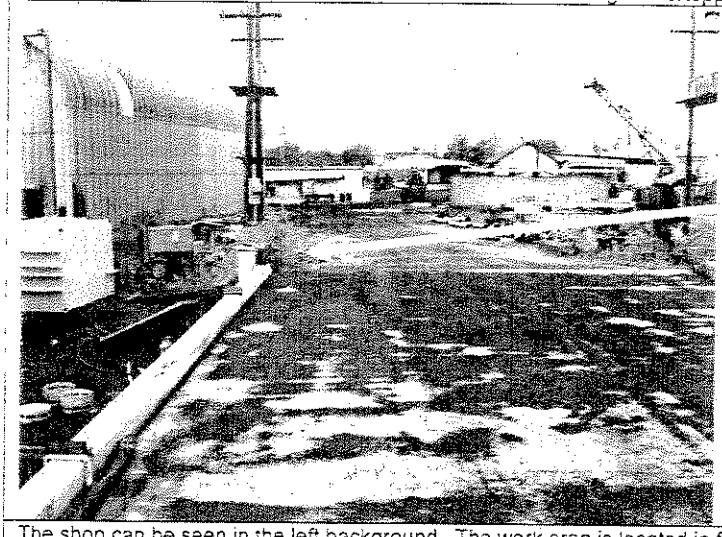


Stormwater discharge point that is not permitted. This has been an issue over several site visits with facility personnel reporting that the discharge has been prevented. The erosion patterns seen do not support this statement.

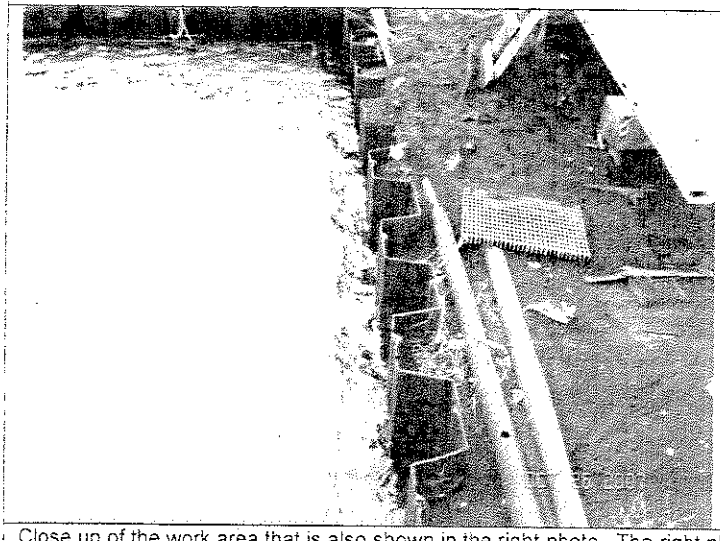




Work area adjacent to both the covered shops and the concrete service pier. One of the shops can be seen in the photo below. It appears that sandblasting had recently been conducted with these tanks just recently painted. Without any controls in place, it appears that the blast material is leaving this work area and being deposited at several locations, including the river. The right photo shows the cross beam for the bulkhead covered in sandblast material. Several areas of the bulkhead have blast grit overtopping the lip.



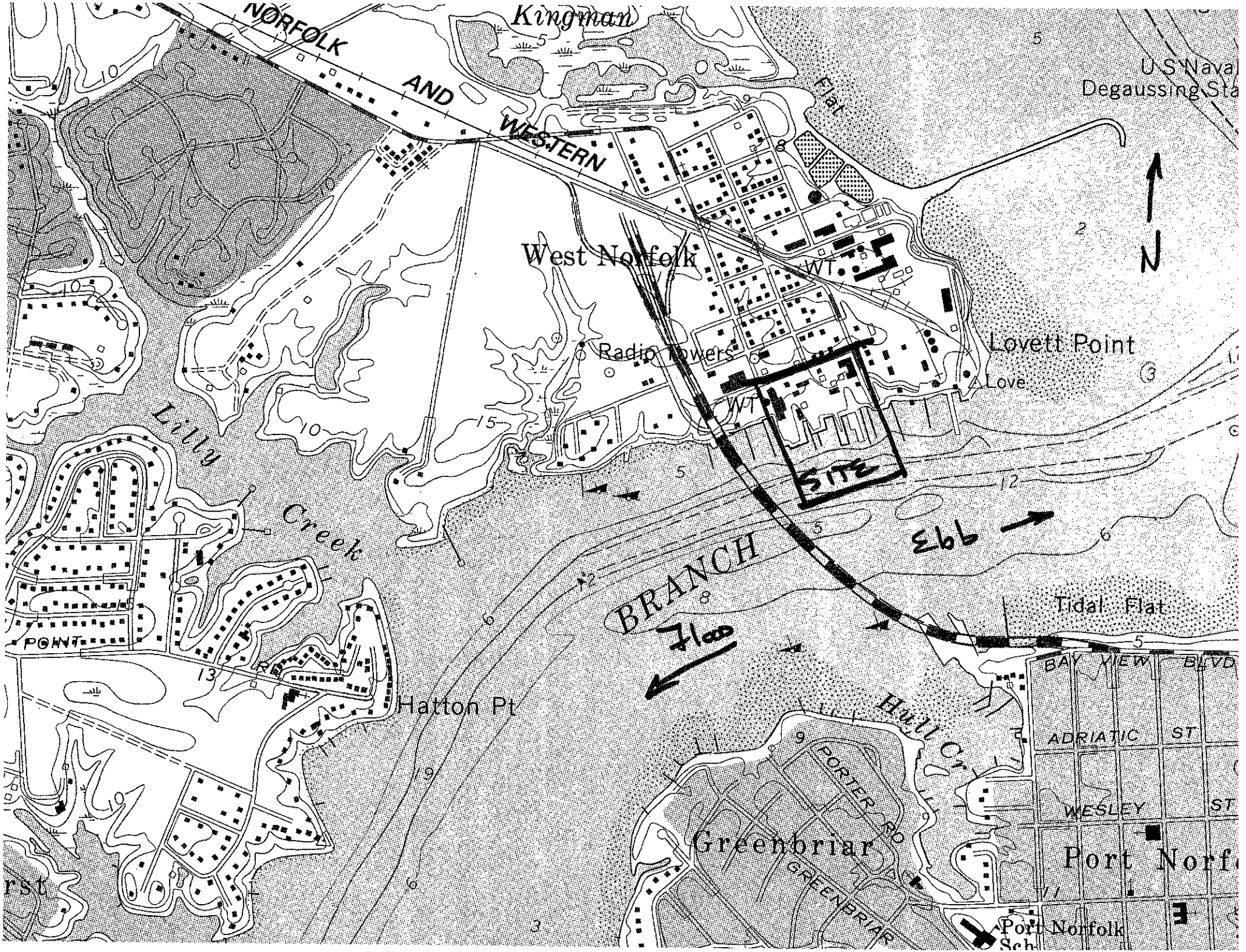
The shop can be seen in the left background. The work area is located in front of this shop. The hay bales shown in the photo on the right are located at the end of the pier, indicated by the arrow. Deposition of the blast materials on the bales also provides indications that the blast material is making it to and covering the pier.



Close up of the work area that is also shown in the right photo. The right photo shows that if this blast material is being deposited onto the pier, then material is also being deposited in to the water.

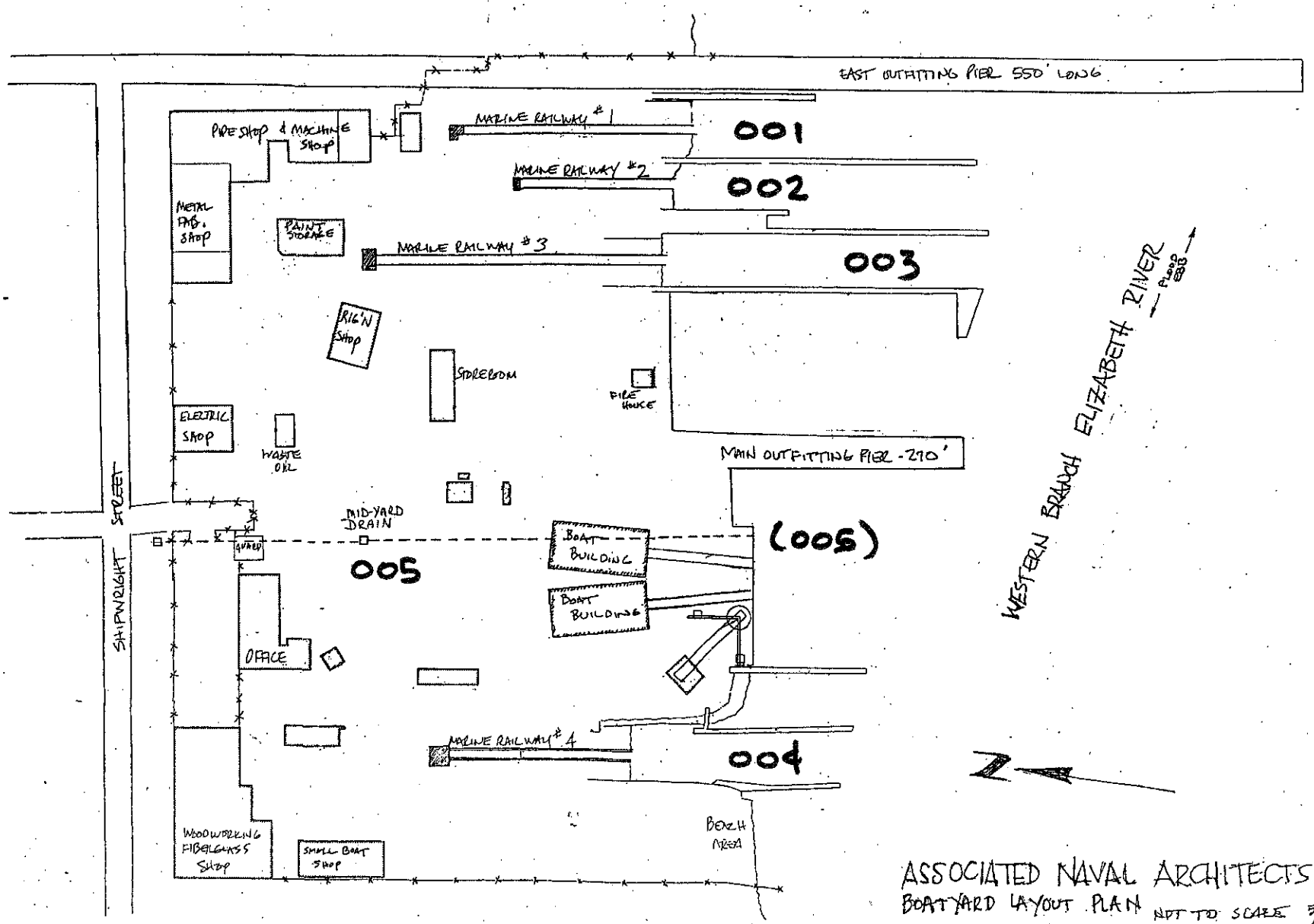
# ATTACHMENT 2

# DISCHARGE LOCATION/TOPOGRAPHIC MAP


NORFOLK AND WESTERN
Kingman
West Norfolk
Radio Towers
WT
WT
SITE
Lovett Point
Love
U S Naval
Degaussing Sta
N
Lilly Creek
BRANCH
Flood
Ebb
Tidal Flat
Hatton Pt
POINT
Hull Cr
Greenbriar
PORTER RD
GREENBRIAR
BAY VIEW BLVD
ADRIATIC ST
WESLEY ST
Port Norf
Port Norfolk
Sch

# ATTACHMENT 3

# SCHEMATIC/PLANS & SPECS/SITE MAP/ WATER BALANCE




ASSOCIATED NAVAL ARCHITECTS

BOATYARD LAYOUT PLAN NOT TO SCALE 5/21/08

# ATTACHMENT 4

# TABLE I - DISCHARGE/OUTFALL DESCRIPTION

# ATTACHMENT 4
## NUMBER AND DESCRIPTION OF OUTFALLS

| OUTFALL NO. | DISCHARGE LOCATION | DISCHARGE SOURCE (1) | TREATMENT (2) | FLOW (3) |
|---|---|---|---|---|
| 001 | 036°51'34" N<br>076°20'41" W<br><br>2-WBE000.57 | Conventional Marine Railway; parallel set of tracks extending into River atop which sets an open carriage upon which are affixed vessels to be hauled for servicing, repair and maintenance in a dry working environment; underlying soils permeable and process wastewater have direct hydraulic access and resulting contact with receiving stream; no current means of process wastewater controls exist for collection prior to discharge from the railway point sources.<br><br>Process wastewater generated as result of washing hull with water under pressure to remove fouling, muds, sediments, paint and other coatings and material from hull prior to service or repair. | The permittee relies on the continual imposition of suitable and appropriate best management practices (BMP) during all aspects of industrial activities performed at and around the marine railways.<br><br>The permit contains a list of BMPs that address most process operations expected at the facility. If utilized, water quality in the adjacent stream should be protected.<br><br>Process wastewaters, when generated during hull preparation activities, are allowed to fall upon permeable surfaces beneath each railway location without further control. | **DMR (MGD)**<br>(4 events)<br><br>max: 0.013<br>min: 0.001<br>avg: 0.006<br><br>**EPA 2C (MGD)**<br><br>0.0001<br><br>(for all railways) |
| 901 | | Storm water runoff from a regulated industrial activity; use of BMPs expected to ensure site cleanliness. | | |
| 002<br>902 | 036°51'34" N<br>076°20'41" W<br><br>2-WBE000.58 | Same as 001 | | DMR (MGD)<br>(4 events)<br><br>max: 0.027<br>min: 0.005<br>avg: 0.013 |
| | | Same as 901 | | |
| 003<br>903 | 036°51'33" N<br>076°20'42" W<br><br>2-WBE000.63 | Same as 001; facility has identified this railway as offering the most lift capability and opportunity for regular Part I.A. sampling. | | DMR (MGD)<br>(15 events)<br><br>max: 0.043<br>min: 0.001<br>avg: 0.010 |
| | | Same as 901 | | |
| 004<br>904 | 036°51'32" N<br>076°20'47" W<br><br>2-WBE000.70 | Same as 001 | | DMR (MGD)<br>(5 events)<br><br>max: 0.022<br>min: 0.001<br>avg: 0.008 |
| | | Same as 901 | | |
| 005<br>(NEW) | 036°51'32" N<br>076°20'47" W<br><br>2-WBE000.68 | Storm water runoff from upland industrial area; runoff from city roadway. | Recently discovered outfall and yard drain; use of BMPs expected. | unknown |

(1) List operations contributing to flow
(2) Give brief description, unit by unit
(3) Give maximum 30-day average flow for industry and design flow for municipal

# ATTACHMENT 5

# TABLE II - EFFLUENT MONITORING/LIMITATIONS

# ATTACHMENT 5 - TABLE II
## INDUSTRIAL EFFLUENT LIMITATIONS/MONITORING

OUTFALL NUMBERS: 001, 002, and 004

Outfall Description: Marine railways - Process wastewater(s) associated with, and resulting from, vessel inspection, repair, and/or maintenance

A. 1. Effluent Limitations and Monitoring Requirements

SIC CODE: 4499/3731/3732

(X) Final Limits ( ) Interim Limits Effective Dates - From: Reissuance To: Expiration

| PARAMETER & UNITS | BASIS FOR LIMITS | MULTIPLIER OR PRODUCTION | DISCHARGE LIMITATIONS | | | MONITORING REQUIREMENTS [a] | |
|---|---|---|---|---|---|---|---|
| | | | MONTHLY AVERAGE | MINIMUM | MAXIMUM | FREQUENCY | SAMPLE TYPE |
| Flow (MGD) | BPJ | | NA | NA | NL | 1/Year | Calculated |
| pH (S.U.) | BPJ | | NA | 6.0 | 9.0 | 1/Year | Grab |
| Total Suspended Solids (mg/l) [b] | BPJ | | NA | NA | NL | 1/Year | Grab |
| Dissolved Copper (ug/l) [b] | BPJ | | NA | NA | NL | 1/Year | Grab |
| Dissolved Zinc (ug/l) [b] | BPJ | | NA | NA | NL | 1/Year | Grab |

NA = NOT APPLICABLE; NL = NO LIMIT, MONITORING REQUIREMENT ONLY

1/Year = Between January 1 and December 31.

Upon issuance of the permit, Discharge Monitoring Reports (DMRs) shall be submitted to the regional office at the frequency required by the Part I.A. of the permit for this outfall regardless of whether an actual discharge occurs. In the event that there is no discharge for the monitoring period, then "no discharge" shall be reported on the DMR.

# ATTACHMENT 5 - TABLE II
# INDUSTRIAL EFFLUENT LIMITATIONS/MONITORING

OUTFALL NUMBERS: 001, 002, and 004 (continued)

Outfall Description: Marine railways - Process wastewater(s) associated with, and resulting from, vessel inspection, repair, and/or maintenance

SIC CODE: 4499/3731/3732

[a] See Part I.B.6.b. for information regarding wastewater sampling protocol development and notification requirements, and Part I.B.6.f. for additional monitoring requirements and specific process information to be reported with the Discharge Monitoring Reports (DMR).

Sampling over the life of the permit shall be representative of all the different activities which occur at the permitted outfall including, but not limited to, generated hull process waters, as defined below. The activity from which the process water sample originated must be specified in the comments section of each submitted DMR for the outfall, or as an attachment to the DMR.

Process wastewater related to hull work shall be any water used on a vessel's hull for any purpose regardless of application pressure, including but not limited to the activities of removing marine salts, sediments, marine growth and paint or other hull cleaning activities using water such as preparing hull areas for inspection or work (cutting, welding, grinding, etc.).

[b] See Parts I.B.3. and I.B.4. for quantification levels and reporting requirements, respectively.

2. The use of tributyltin and/or the generation and release of defined TBT wastewaters are prohibited at these marine railways.

3. There shall be no discharge of floating solids or visible foam in other than trace amounts.

The bases for the limitations codes are:

I. Technology (e.g., Federal Effluent Guidelines), II. Water Quality Standards (9 VAC 25-260 et. seq.), III. **Best Professional Judgment**

# ATTACHMENT 5 - TABLE II
# INDUSTRIAL EFFLUENT LIMITATIONS/MONITORING

OUTFALL NUMBER: 003

Outfall Description: Marine railway - Process wastewater(s) associated with, and resulting from, vessel inspection, repair, and/or maintenance

A. 1. Effluent Limitations and Monitoring Requirements

SIC CODE: 4499/3731/3732

(X) Final Limits ( ) Interim Limits Effective Dates - From: Reissuance To: Expiration

| PARAMETER & UNITS | BASIS FOR LIMITS | MULTIPLIER OR PRODUCTION | DISCHARGE LIMITATIONS | | | MONITORING REQUIREMENTS [a] | |
|---|---|---|---|---|---|---|---|
| | | | MONTHLY AVERAGE | MINIMUM | MAXIMUM | FREQUENCY | SAMPLE TYPE |
| Flow (MGD) | BPJ | | NA | NA | NL | 1/3 Months | Calculated |
| pH (S.U.) | BPJ | | NA | 6.0 | 9.0 | 1/3 Months | Grab |
| Total Suspended Solids (mg/l) [b] | BPJ | | NA | NA | NL | 1/3 Months | Grab |
| Dissolved Copper (ug/l) [b] | BPJ | | NA | NA | NL | 1/3 Months | Grab |
| Dissolved Zinc (ug/l) [b] | BPJ | | NA | NA | NL | 1/3 Months | Grab |

NA = NOT APPLICABLE; NL = NO LIMIT, MONITORING REQUIREMENT ONLY

1/3 Months = In accordance with the following schedule: 1st quarter (January 1 - March 31); 2nd quarter (April 1 - June 30); 3rd quarter (July 1 - September 30); 4th quarter (October 1 - December 31).

Upon issuance of the permit, Discharge Monitoring Reports (DMRs) shall be submitted to the regional office at the frequency required by the Part I.A. of the permit for this outfall regardless of whether an actual discharge occurs. In the event that there is no discharge for the monitoring period, then "no discharge" shall be reported on the DMR.

# ATTACHMENT 5 - TABLE II
# INDUSTRIAL EFFLUENT LIMITATIONS/MONITORING

OUTFALL NUMBERS: 003 (continued)

Outfall Description: Marine railway - Process wastewater(s) associated with, and resulting from, vessel inspection, repair, and/or maintenance

SIC CODE: 4499/3731/3732

[a] See Part I.B.6.b. for information regarding wastewater sampling protocol development and notification requirements, and Part I.B.6.f. for additional monitoring requirements and specific process information to be reported with the Discharge Monitoring Reports (DMR).

Sampling over the life of the permit shall be representative of all the different activities which occur at the permitted outfall including, but not limited to, generated hull process waters, as defined below. The activity from which the process water sample originated must be specified in the comments section of each submitted DMR for the outfall, or as an attachment to the DMR.

Process wastewater related to hull work shall be any water used on a vessel's hull for any purpose regardless of application pressure, including but not limited to the activities of removing marine salts, sediments, marine growth and paint or other hull cleaning activities using water such as preparing hull areas for inspection or work (cutting, welding, grinding, etc.).

[b] See Parts I.B.3. and I.B.4. for quantification levels and reporting requirements, respectively.

2. The use of tributyltin and/or the generation and release of defined TBT wastewaters are prohibited at this marine railway.

3. There shall be no discharge of floating solids or visible foam in other than trace amounts.

The bases for the limitations codes are:

I. Technology (e.g., Federal Effluent Guidelines), II. Water Quality Standards (9 VAC 25-260 et. seq.), III. **Best Professional Judgment**

# ATTACHMENT 5 - TABLE II
## STORM WATER EFFLUENT LIMITATIONS/MONITORING

OUTFALL No.: 901, 902, 904

Outfall Description: Marine railways - storm water runoff from regulated industrial activity.

SIC CODE: 4499/3731/3732

| PARAMETER & UNITS | STORM CATEGORY | DISCHARGE LIMITATIONS | | MONITORING REQUIREMENTS | |
|---|---|---|---|---|---|
| | | MINIMUM | MAXIMUM | FREQUENCY | SAMPLE TYPE |
| THESE OUTFALLS SHALL CONTAIN STORM WATER RUNOFF ASSOCIATED WITH A REGULATED INDUSTRIAL ACTIVITY WHERE NO CHEMICAL MONITORING, BIOLOGICAL TOXICITY TESTING OR QUARTERLY VISUAL EXAMINATIONS ARE REQUIRED.<br><br>IF PERMIT DEFINED PROCESS WASTEWATERS CONTINUE TO BE GENERATED AT THESE LOCATIONS DURING ANY QUALIFYING STORM EVENT, THE PART I.A. PERMIT REQUIREMENTS ASSOCIATED WITH OUTFALLS 001, 002 AND 004 APPLY (PART I.B.6.g.,COMMINGLED PROCESS WASTEWATER AND STORM WATER RUNOFFF). | | | | | |

The basis for the limitations codes are:

A. Technology (e.g., Federal Effluent Guidelines)
B. Water Quality Standards (9 VAC 25-260 et. seq.)
**C. Best Professional Judgment**

# ATTACHMENT 5 - TABLE II
# STORM WATER EFFLUENT LIMITATIONS/MONITORING

OUTFALL No.: 903

Outfall Description: Marine railway - storm water runoff from regulated industrial activity.

SIC CODE: 4499/3731/3732

A. 1. Limitations and Monitoring Requirements

| PARAMETER & UNITS | STORM CATEGORY 1-29 or BPJ | DISCHARGE LIMITATIONS | | MONITORING REQUIREMENTS [a] | |
|---|---|---|---|---|---|
| | | MINIMUM | MAXIMUM | FREQUENCY | SAMPLE TYPE |
| Flow (MG) | C | NA | NL | 1/Year | Estimate [b] |
| pH (S.U.) | C | NL | NL | 1/Year | Grab |
| Total Suspended Solids (mg/l) [c] | C | NA | NL | 1/Year | Grab |
| Dissolved Copper (ug/l) [c] | C | NA | NL | 1/Year | Grab |
| Dissolved Zinc (ug/l) [c] | C | NA | NL | 1/Year | Grab |
| Total Petroleum Hydrocarbons (mg/l) [c] [d] | C | NA | NL | 1/Year | Grab |

NA = NOT APPLICABLE; NL = NO LIMIT, MONITORING REQUIREMENT ONLY

1/Year = Between January 1 and December 31.

Upon issuance of the permit, Discharge Monitoring Reports (DMRs) shall be submitted to the regional office at the frequency required by the permit regardless of whether an actual discharge occurs. In the event that there is no discharge for the monitoring period, then "no discharge" shall be reported on the DMR.

[a] See Parts I.B.6.c. for development of sampling protocols, and I.B.6.g. for definition of commingled storm water and process wastewater.

[b] Estimate of the total volume of the discharge during the storm event.

[c] See Parts I.B.3. and I.B.4. for quantification levels and reporting requirements, respectively.

[d] Total petroleum hydrocarbons (TPH) shall be analyzed using EPA SW 846 Method 8015C for diesel range organics, or by EPA SW 846 Method 8270D. If Method 8270D is used, the lab must report the total of diesel range organics and polynuclear aromatic hydrocarbons.

2. There shall be no discharge of floating solids or visible foam in other than trace amounts.

3. The use of tributyltin is prohibited at this marine railway.

The basis for the limitations codes are:

A. Technology (e.g., Federal Effluent Guidelines), B. Water Quality Standards (9 VAC 25-260 et. seq.), **C. Best Professional Judgment**

# ATTACHMENT 5 - TABLE II
# STORM WATER EFFLUENT LIMITATIONS/MONITORING

OUTFALL No.: 005

Outfall Description: Storm water runoff from regulated industrial activity prior to commingling with runoff from adjacent municipal roadway

SIC CODE: 3731, 3732

| PARAMETER & UNITS | STORM CATEGORY 1-29 or BPJ | DISCHARGE LIMITATIONS | | MONITORING REQUIREMENTS [a] | |
|---|---|---|---|---|---|
| | | MINIMUM | MAXIMUM | FREQUENCY | SAMPLE TYPE |
| Flow (MG) | C | NA | NL | 1/6 Months | Estimate [b] |
| pH (S.U.) | C | NL | NL | 1/6 Months | Grab |
| Total Suspended Solids (mg/l) [c] | C | NA | NL | 1/6 Months | Grab |
| Dissolved Copper (ug/l) [c] | C | NA | NL | 1/6 Months | Grab |
| Dissolved Zinc (ug/l) [c] | C | NA | NL | 1/6 Months | Grab |
| Total Petroleum Hydrocarbons (mg/l) [c] [d] | C | NA | NL | 1/6 Months | Grab |

NA = NOT APPLICABLE; NL = NO LIMIT, MONITORING REQUIREMENT ONLY

1/6 Months = In accordance with the following schedule: 1st half (January 1 - June 30); 2nd half (July 1 - December 31)

Upon issuance of the permit, Discharge Monitoring Reports (DMRs) shall be submitted to the regional office at the frequency required by the permit regardless of whether an actual discharge occurs. In the event that there is no discharge for the monitoring period, then "no discharge" shall be reported on the DMR.

[a] See Part I.D. for additional storm water sampling and reporting requirements. Storm event sampling for this outfall shall be subject to the specified storm event monitoring requirements (0.1 inch; 72 hours separation; storm event duration; rainfall measurements). All other requirements specified under Part I.D.3. shall apply.

[b] Estimate of the total volume of the discharge during the storm event.

[c] See Parts I.B.3. and I.B.4. for quantification levels and reporting requirements, respectively.

[d] Total petroleum hydrocarbons (TPH) shall be analyzed using EPA SW 846 Method 8015C for diesel range organics, or by EPA SW 846 Method 8270D. If Method 8270D is used, the lab must report the total of diesel range organics and polynuclear aromatic hydrocarbons.

The basis for the limitations codes are: A. Technology (e.g., Federal Effluent Guidelines), B. Water Quality Standards (9 VAC 25-260 et. seq.), C. Best Professional Judgment